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

10/15/2012

Certified Mail

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

Mr. George Frahn
Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43216

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448011664
Permit Number: P0109082
Permit Type: Administrative Modification
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. 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
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

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 Toledo Department of Environmental Services at (419)936-3015.

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*
TDES; Michigan; Indiana; Canada

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Comfort Line Ltd. is a manufacturer of extruded plastics operating in Lucas County. The facility is a major source of HAPs (styrene) and is permitted as a Title V source. Comfort Line requested a modification of their Title V permit to incorporate the requirements of OAC 3734-21-25 (RPC RACT rule), and incorporate new particulate matter control and operating requirements. During the review of the Title V permit it was determined that a modification to simplify the BAT determination of the 2010 permit to install P0105966 for P001 thru P006 was appropriate based on the elimination of the OAC rule 3745-21-07 requirements for non-photochemically reactive cleanup (OC emissions). Based on our review this modification will eliminate the existing OC requirements for these emissions units. By maintaining the facility wide OAC rule 3745-31-05(D) limitation of 90 tpy VOC, this modification will not result in an overall increase of allowable, or actual emissions of criteria pollutants. However since the restrictions for OC based on OAC rule 3745-21-07 of 7.3 tons per year will be removed, emissions units P002 – P006 will be considered to have had Chapter 31 modifications. While consulting the facility regarding any factors that might impact setting the emission limits to PTE, the facility requested changes based on current production analysis. The facility submitted a modified application to modify the potential to emit.

3. Facility Emissions and Attainment Status:

   Comfort Line is a major source of individual HAPs (styrene). All criteria pollutants are emitted in minor quantities. Lucas County is in attainment status for all criteria air pollutants.

4. Source Emissions:

   <u>P001 in P0105966 issued 7/7/2010</u> includes the following emissions limitations:

   PE - 0.07 pound per hour and 0.31 ton per year
   VOC - 3.75 pounds per hour, 90.00 pounds per day, and 16.43 tons per year, excluding emissions from non-VOC, non-photochemically reactive clean-up materials
   OC - 2.18 tons per month and 26.14 tons per year from clean-up materials from all mixing and pultrusion lines at the facility

   <u>P001 in P0110677</u> includes the following emissions limitations:

   PE - 0.07 pound per hour and 0.31 ton per year (no change)

   VOC – Facility has requested an emission factor change that would take into account the use of a MACT compliant cover for the mixer. Continental Structural Plastics (CSP) of Ohio (0204020245) performed a VOC emissions test using U.S EPA Method 204, 204B, and 204D on September 30, 2004 with the use of a shroud during a similar mixing operation. This resulted in an emission factor of

0.00345 pound of styrene emissions per pound of styrene content. The previous emission factor was based on paint mixing; this emission factor is more accurate. The facility proposed 0.005 pound of styrene emissions per pound of styrene content as an emission factor for their mixer to provide a margin of safety. This resulted in more stringent emission limits as follows:

Mix rate: 1,000 pounds paste per hour
Resin (styrene) as percent of paste: 37.50% by weight
Mixer emission factor: 0.005 pound VOC emissions per pound of resin
VOC emissions = (Mix rate)(% styrene)(emission factor)
= (1000 lb paste/hr)(37.5% styrene)(0.005 lb VOC/lb styrene)
= 1.88 lb VOC/hr
Annual VOC emissions = (1.88 lb VOC/hr)(8760 hr/yr)/(2000 lb/ton) = 8.23 tons/yr

<u>P002 and P003 in P0105966 issued 7/7/2010</u>, each include the following emissions limitations:

PE - 0.004 pound per hour and 0.02 ton per year
VOC - 2.5 pounds per hour, 40 pounds per day and 7.3 tons per year
OC - 2.18 tons per month and 26.14 tons per year from clean-up materials from all mixing and pultrusion lines at this facility

<u>P002 and P003 in P0109082</u>, each include the following emissions limitations based on PTE:

PE – Information provided on application modification dated 9/20/2012:
Linear foot of product per minute: 6.00 feet/minute
Minimum part length: 12 ft
Maximum part weight per linear foot: 1.83 pounds/linear foot
Cut width: 0.1875 inches = 0.015625 feet
Control and capture efficiency (CE): 99% with fabric filter
Cutting rate = (6.0 Linear ft/min)(1 cut/12 linear ft) = 0.5 cut/min = 30 cut/hr
Uncontrolled PE = (cut rate)(cut width)(weight/linear foot)
= (30 cut/hr)(0.015625 linear ft/cut)(1.83 lbs/linear ft) = 0.86 lb/hr
Controlled PE = (Uncontrolled PE)(1-CE) = (0.86 lbs/hr)(1-0.99) = 0.009 lb/hr
Annual controlled PE = (0.009 lb/hr)(8760 hrs/yr)/(2000 lb/ton) = 0.04 ton/yr

VOC – Information provided on application modification dated 9/20/2012:
Paste per linear foot product: 0.55 lb paste/linear foot
Linear foot of product per minute: 6.00 linear feet/minute
Maximum resin content (Styrene) in paste: 37.5% by weight
Emission factor: 0.04 lb VOC/lb resin content (AP-42 Chapter 4.4, Table 4.4-2 (2/07))
VOC = (0.55 lb paste/linear ft)(6.00 linear ft/min)(60 min/hr)(0.375 lb resin/lb paste)(0.04 lb VOC/lb resin) = 3.0 lb VOC/hr

With the removal of the 40 pound per day emission limit due to revision of OAC rule 3745-21-07, the annual limit becomes PTE: (3.0 lbs/hr)(8760 hrs/yr)/(2000 lbs/ton) = 13.14 tons/yr

P004 in P0105966 issued 7/7/2010 includes the following emissions limitations:

PE - 0.004 pound per hour and 0.02 ton per year
VOC - 4.9 pounds per hour, 40 pounds per day and 7.3 tons per year
OC - 2.18 tons per month and 26.14 tons per year from clean-up materials from all mixing and pultrusion lines at this facility

P005 and P006 in P0105966 issued 7/7/2010, each include the following emissions limitations:

PE - 0.005 pound per hour and 0.03 ton per year
VOC - 3.6 pounds per hour, 40 pounds per day and 7.3 tons per year
OC - 2.18 tons per month and 26.14 tons per year from clean-up materials from all mixing and pultrusion lines at this facility

The facility was unable to achieve the line speed originally expected for P005 and P006 and never achieved that above the line speed for P004 but was able to achieve a profile size like Line C (P004). The emissions are now the same as found in P004 and therefore P004 – P006 will be grouped in the permit.

P004, P005 and P006 in P0109082 include the following emissions limitations:

PE - Information provided on application modification dated 9/20/2012:
Linear foot of product per minute: 6.00 feet/minute
Minimum part length: 12 ft
Maximum part weight per linear foot: 3.0 pounds/linear foot
Cut width: 0.1875 inches = 0.015625 feet
Control and capture efficiency (CE): 99% with fabric filter
Cutting rate = (6.0 Linear ft/min)(1 cut/12 linear ft) = 0.5 cut/min = 30 cut/hr
Uncontrolled PE = (cut rate)(cut width)(weight/linear foot)
= (30 cut/hr)(0.015625 linear ft/cut)(3.0 lbs/linear ft) = 1.41 lb/hr
Controlled PE = (Uncontrolled PE)(1-CE) = (1.41 lbs/hr)(1-0.99) = 0.02 lb/hr
Annual controlled PE = (0.02 lb/hr)(8760 hrs/yr)/(2000 lb/ton) = 0.09 ton/yr

VOC - Information provided on application modification dated 9/20/2012:
Paste per linear foot product: 0.90 lb paste/linear foot
Linear foot of product per minute: 6.00 linear feet/minute
Maximum resin content (Styrene) in paste: 37.5% by weight
Emission factor: 0.04 lb VOC/lb resin content (AP-42 Chapter 4.4, Table 4.4-2 (2/07))
VOC = (0.90 lb paste/linear ft)(6.00 linear ft/min)(60 min/hr)(0.375 lb resin/lb paste)(0.04 lb VOC/lb resin) = 4.9 lb VOC/hr

With the removal of the 40 pound per day emission limit due to revision of OAC rule 3745-21-07, the annual limit becomes PTE: (4.9 lbs/hr)(8760 hrs/yr)/(2000 lbs/ton) = 21.47 tons/yr

The 2010 emissions fee report indicated facility wide emissions of 3.14 tpy VOC with emissions from P001 through P006 each listed as “Less Than Reporting Requirement”.

5. Conclusion:

While individual annual emissions limitations have been relaxed, the facility-wide emission limitation of 90.0 tons of VOC per rolling, 12-month period has not changed. This permit modification does not substantially change the 2009 permit determination and is considered to be non-controversial. The permit should be issued draft/final as Comfort Line is a Title V facility.

6. Please provide additional notes or comments as necessary:

P0105966 issued 7/7/2010 did not modify the VOC BAT determination established by PTI 04-01457 as issued 12/5/2006. However a restriction on OC was included in PTI 04-01457 based on existing requirements under the now revised 21-07 rules. There is no requirement to set a separate restriction for VOC clean-up solvent related emissions under OAC rule 3745-31-05 as the VOC being emitted exclusively from coatings is considered to be the worst case operating scenario (i.e., since hourly coating emissions are higher than the hourly cleanup emissions, the coating restriction represents the worst case rate of VOC emissions for PTE purposes). Therefore the clean-up material OC restrictions will be removed from the permit. VOC emissions from the use of clean-up material will be tracked in the calculation for compliance with the total annual VOC emissions (90 tons as a rolling, 12-month summation facility-wide), however since the only clean-up material currently employed is acetone; no VOC emissions are anticipated from clean-up. Additionally the daily VOC restriction was removed from the BAT determination leaving only the State recommended pound per hour and ton per year restrictions, consistent with current BAT practices for a 12/5/2006 BAT. New annual limitations for VOC were established for P002 thru P006, as the now defunct 40 pound VOC daily restriction served to limit the annual emissions to 7.3 TPY.

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

Pollutant	Tons Per Year
PE	0.66 (+ 0.23)
VOC	98.92 with a 90 TPY facility-wide limit (no increase)

PUBLIC NOTICE
10/15/2012 Issuance of Draft Air Pollution Permit-To-Install

Comfort Line Ltd.
5500 Enterprise Blvd,
Toledo, OH 43612
Lucas County
FACILITY DESC.: All Other Plastics Product Manufacturing
PERMIT #: P0109082
PERMIT TYPE: Administrative Modification
PERMIT DESC: Administrative modification to BAT for non-volatile organic emissions in consideration of the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25.

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: Babak Firoozi, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

Facility ID:	0448011664
Permit Number:	P0109082
Permit Type:	Administrative Modification
Issued:	10/15/2012
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

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Authorization

Facility ID: 0448011664
Facility Description: Manufacture of extruded plastics
Application Number(s): M0001449, A0045668
Permit Number: P0109082
Permit Description: Administrative modification to BAT for non-volatile organic emissions in consideration of the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25.
Permit Type: Administrative Modification
Permit Fee: $200.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/15/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43612

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

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109082
Permit Description: Administrative modification to BAT for non-volatile organic emissions in consideration of the recent revisions to OAC rule 3745-21-07 and applicability of OAC rule 3745-21-25.

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:	Mixer 1
Superseded Permit Number:	P0105966
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission

limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently

removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The combined emissions of volatile organic compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, P006 and P014.

3. The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation:

   a) for K001, K002 and P014:

      (1) the company identification for each coating material employed;

      (2) the number of gallons of each coating, as employed;

      (3) the organic compound content of each coating, as employed, in pounds per gallon;

      (4) the total VOC emission rate for all coatings employed calculated as a summation of a)(2) x a)(3) for all coatings, in pounds per month;

   b) for P001:

      (1) the company identification of each resin employed;

      (2) the weight of each resin employed in pounds;

      (3) the VOC content of each resin employed, in percent by weight;

      (4) the total VOC emission rate for all resin employed calculated as the summation of b)(2) x b)(3) for all resins multiplied by the emission factor of 0.005 pound VOC per pound of available VOC content (determined from results of a U.S. EPA Method 204-compliant temporary total enclosure VOC emissions test, conducted on 9/30/2004 at Continental Structural Plastics of Ohio, 0204020245, using a MACT compliant covered mixer), in pounds per month;

   c) for P002, P003, P004, P005 and P006:

      (1) the company identification of each resin employed;

      (2) the weight of each resin employed in pounds;

      (3) the VOC content of each resin employed, in percent by weight;

      (4) the total VOC emission rate for all resin employed calculated as the summation of c)(2) x c)(3) for all resins multiplied by the emission factor for open lines of 0.04 pound VOC per pound of resin applied (AP-42 Chapter 4.4, Table 4.4-2 (2/07), in pounds per month;

(5) when employing enclosures or resin injection (direct or preform), actual emissions may be calculated as four tenths or one tenth , respectively, of open line emissions; and

(6) as provided in OAC rule 3745-21-25(F)(3)(a), the permittee may use the cited emissions factors or may calculate the VOC emissions factor based on the equations in table 1 to subpart WWWW of 40 CFR 63, or any VOC emissions factor approved by USEPA, such as emission factors or emission factor equations from AP-42, or site-specific VOC emissions factors if they are supported by VOC emissions test data. The organic HAP emissions factors in table 1 to Subpart WWWW of 40 CFR 63 are equivalent to the VOC emissions factors for this requirement. Permittee shall notify the Toledo Division of Environmental Services of any change in emission factors. Permittee shall notify the Ohio EPA (Toledo Division of Environmental Services) of any change in emission factors.

d) for all emissions units facility-wide:

(1) the company identification for each cleanup material employed;

(2) the volume of each cleanup material applied in gallons;

(3) the VOC content of each cleanup material applied in pounds per gallon;

(4) the total VOC emission rate for all clean-up materials employed calculated as a summation of d)(2) x d)(3) for all cleanup materials, in pounds per month;

e) the monthly VOC emissions rate from all emissions units, calculated as a summation of the total VOC emissions rates from all coatings, resins and clean-up materials recorded above divided by 2000 pounds per ton, in tons per month; and

f) the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.

5. The owner or operator shall report if the facility exceeds the one hundred tons of VOC per year emissions threshold if that exceedance would make the facility subject to paragraph (D)(3) of OAC rule 3745-21-25.

6. The terms and conditions contained in this Permit to Install (PTI) for emissions units P001 through P006 supercede all requirements for P001 through P006 contained in PTI P0110554.

7. 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.

8. The following emissions units contained in this permit are subject to the applicable requirements of 40 CFR Part 63, Subparts A and WWWW: P001. 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 Toledo Division of Environmental Services. P001 through P006

C. Emissions Unit Terms and Conditions

1. P001, Mixer 1

Operations, Property and/or Equipment Description:

Resin Blending Mixer 1 with particulate filtration system.

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) (PTI 04-01457, issued 12/5/06)	The emissions of volatile organic compounds (VOC) shall not exceed 1.88 pounds per hour. See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0105966, issued 7/7/2010)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.07 pound per hour and 0.31 ton per year. See b)(2)d.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06 (P0105966, issued 7/7/2010)	See b)(2)e.
d.	OAC rule 3745-17-07(A)(1)	Visible emissions of particulate from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.
e.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 2.58 pounds per hour.
f.	OAC Rule 3745-21-25	The permittee shall follow the work practice standards in accordance with the applicable portions of Table 1 of this rule.
g.	40 CFR Part 63, Subpart A (40 CFR 63.1 - 63.16)	See b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935) [In accordance with 40 CFR 63.5805(b), this emissions unit is a mixing operation at an existing area source that became a major source after the date of publication of this subpart subject to the emissions limitations/control measures specified in this section.]	The permittee shall follow the work practice standards in accordance with the applicable portions of 40 CFR 63.5805 and Table 4 of this rule.

(2) Additional Terms and Conditions

a. The VOC emissions from the mixing operation consist of styrene.

b. The hourly VOC emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop separate monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations. The permittee shall submit a new application and be issued a new permit if a new process material is to be used that would cause the emissions unit to exceed the permitted potential to emit established in this permit.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1), and OAC rule 3745-21-25.

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

e. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the controlled annual emissions rate for PE is less that 10 tons/yr taking into account the use of a particulate filtration system with a minimum control efficiency of 99% by weight.

f. Table 15 to 40 CFR Part 63 Subpart WWWW shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.

c) Operational Restrictions

(1) The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

(2) The permittee shall comply with the applicable restrictions required under OAC rule 3745-21-25, including Table 1 – Work practice standards.

(3) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the particulate filtration system was not in service when the emission unit was in operation.

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(3) If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under paragraphs (O) and (P) of OAC rule 3745-21-25, including the following:

a. A certified statement that operations are in compliance with the work practice standards specified in table 1 of this rule, as applicable.

(5) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

e) Reporting Requirements

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

a. any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation;

b. an identification of each day during which an inspection was not performed by the required frequency; and

c. an identification of each instance when an equipment standard(s) or work practice(s) was not implemented.

If no deviations occurred during the reporting period, the permittee shall submit a quarterly report which states that no deviations occurred during that period.

(2) The permittee shall submit semiannual reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

(3) The permittee shall submit a semiannual compliance report that contains the information and submitted in the time frame specified in paragraph (Q) of OAC rule 3745-21-25. If the semiannual compliance report required by the Title V permit includes all the information required for this rule, the report for the Title V permit shall be deemed to satisfy any obligation for reporting for this rule.

(4) See 40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935).

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

(6) 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 Limitation:

Visible emissions of particulate shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

1.88 pounds of VOC per hour.

Applicable Compliance Method:

This emission limit represents the potential to emit and was developed based on the emission factor of 0.005 pound of VOC emissions per pound of resin (VOC content) (determined from results of a U.S. EPA Method 204-compliant temporary total enclosure VOC emissions test, conducted on 9/30/2004 at Continental Structural Plastics of Ohio, 0204020245, using a MACT compliant covered mixer). This emission factor was multiplied by the maximum resin content (37.5% by weight) in the maximum mix rate of 1000 pounds of paste per hour..

If required, the permittee shall demonstrate compliance with this emission limitation through testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling. This test would also include the use of enclosure per U.S. EPA Methods 204, 204B, and 204D of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

2.58 pounds of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

0.07 pound of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

0.31 ton of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.07 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.