



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/29/2012

TrudieChamblin
FLEXIBLE FOAM PRODUCTS
200 E NORTH ST
Spencerville, OH 45887

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0302000288
Permit Number: P0110055
Permit Type: Renewal
County: Allen

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

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 Lima News. 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NWDO; Indiana



Permit Strategy Write-Up

1. Check all that apply:

X Synthetic Minor Determination

Netting Determination

- 2. Source Description: Flexible Foam Products is a specialty foam manufacturer located in Allen County. Operations at the facility include P001 - slabstock foam production line; P002 - rebond foam production line; P003 - foam fabrication using spray-on adhesive; P004 - foam fabrication booth to manufacture mattress cores using spray-on adhesive; T002, T005 and T007 - three fixed roof storage tanks for toluene diisocyanate; T008 and T009 - two fixed roof storage tanks for diphenylmethanediisocyanate; and T010 and T011 - two fixed roof storage tanks for rebond binder solution.
3. Facility Emissions and Attainment Status: Flexible Foam Products is located in Allen county and is classified as a synthetic minor facility for Title V and is not considered a "major source" for MACT. Allen County is designated attainment for all criteria pollutants.
4. Source Emissions: Flexible Foam Products has requested federally enforceable synthetic minor restrictions which will limit facilitywide VOC emissions to 43.74 tons per rolling, 12-month period and facility wide HAPs emissions to 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling 12-month for combined HAPs. The individual VOC emissions are as follows:

Table with 2 columns: Emissions Unit(s) and VOC Emissions (tons/rolling, 12-month period). Rows include P001, P002, P003, P004, P001-P004 (combined), T002, T005, T007, T008, T009, T010, and T011.

5. Conclusion: With the federally enforceable synthetic minor restrictions in place, the facility will not trigger the thresholds for Title V or MACT.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM ₁₀	11.26
VOC	43.74
Individual HAPs	9.90
Combined HAPs	24.90

PUBLIC NOTICE

10/29/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

FLEXIBLE FOAM PRODUCTS

200 E NORTH ST,
Spencerville, OH 45887
Allen County

FACILITY DESC.: Polystyrene Foam Product Manufacturing

PERMIT #: P0110055

PERMIT TYPE: Renewal

PERMIT DESC: Renewal FEPTIO for P001 - slabstock foam production line; P002 - rebond foam production line; P003 - foam fabrication using spray-on adhesive; P004 - foam fabrication booth to manufacture mattress cores using spray-on adhesive; T002, T005 and T007 - three fixed roof storage tanks for toluene diisocyanate; T008 and T009 - two fixed roof storage tanks for diphenylmethanediisocyanate; and T010 and T011 - two fixed roof storage tanks for rebond binder solution.

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

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
FLEXIBLE FOAM PRODUCTS**

Facility ID:	0302000288
Permit Number:	P0110055
Permit Type:	Renewal
Issued:	10/29/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
FLEXIBLE FOAM PRODUCTS

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Authorization

Facility ID: 0302000288
 Application Number(s): A0044472, A0045089
 Permit Number: P0110055
 Permit Description: Renewal FEPTIO for P001 - slabstock foam production line; P002 - rebond foam production line; P003 - foam fabrication using spray-on adhesive; P004 - foam fabrication booth to manufacture mattress cores using spray-on adhesive; T002, T005 and T007 - three fixed roof storage tanks for toluene diisocyanate; T008 and T009 - two fixed roof storage tanks for diphenylmethanediisocyanate; and T010 and T011 - two fixed roof storage tanks for rebond binder solution.

Permit Type: Renewal
 Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 10/29/2012
 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:

FLEXIBLE FOAM PRODUCTS
 200 E NORTH ST
 Spencerville, OH 45887

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110055
Permit Description: Renewal FEPTIO for P001 - slabstock foam production line; P002 - rebond foam production line; P003 - foam fabrication using spray-on adhesive; P004 - foam fabrication booth to manufacture mattress cores using spray-on adhesive; T002, T005 and T007 - three fixed roof storage tanks for toluene diisocyanate; T008 and T009 - two fixed roof storage tanks for diphenylmethanediisocyanate; and T010 and T011 - two fixed roof storage tanks for rebond binder solution.

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: Slabstock foam Production Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
Company Equipment ID: Rebond foam production line
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: P003
Company Equipment ID: Foam Fabrication
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: P004
Company Equipment ID: Foam Fabrication Booth
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Storage Tank Group #1 - TDI

Emissions Unit ID:	T002
Company Equipment ID:	TDI Storage Tank (Z003)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	C12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T007
Company Equipment ID:	C09
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Storage Tank Group #2 - MDI

Emissions Unit ID:	T008
Company Equipment ID:	C01
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T009
Company Equipment ID:	C22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Draft Permit-to-Install and Operate

FLEXIBLE FOAM PRODUCTS

Permit Number: P0110055

Facility ID: 0302000288

Effective Date: To be entered upon final issuance

Group Name: Storage Tank Group #3 - Binder

Emissions Unit ID:	T010
Company Equipment ID:	C17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T011
Company Equipment ID:	C21
Superseded Permit Number:	
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, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ 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.

¹Permittees 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) B.2 through B.4
2. This permit establishes the following facility-wide terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) for hazardous air pollutant (HAP) emissions for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements:
 - a) HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the HAPs emission rates specified in the following table:

Maximum Allowable Cumulative HAPs Emissions (tons)

Month(s)	Individual HAP Emissions	Combined HAPs Emissions
1 – 1	2.00	5.00
1 – 2	4.00	10.00
1 – 3	6.00	15.00
1 – 4	8.00	20.00
1 – 12	9.90	24.90

After the first 12 calendar months following the issuance of this permit, compliance with the annual HAP emission limitation shall be based upon the rolling, 12-month summations of the monthly emission rates.

3. The permittee shall collect and record the following HAP information each month for all emissions units at the facility, combined:

- a) The company identification of each HAP containing material;
 - b) The total emission rate for each individual HAP from each HAP containing material in emissions units P001 through P004, T002, T005, and T007 through T011 combined, in tons, based on mass balance emissions calculations and material safety data sheets or other equivalent information detailing the HAP contents.
 - c) The total emission rate for each individual HAP from each HAP containing material in “de minimis” and exempt emissions units, in tons, based on mass balance emissions calculations and material safety data sheets or other equivalent information detailing the HAP contents.
 - d) The total emission rate for each individual HAP from all HAP-containing materials, in tons [summation of B.3.b) and B.3.c)];
 - e) The total emission rate for combined HAPs from all HAP-containing materials, in tons [summation of B.3.d)];
 - f) For the first 12 calendar months following the issuance of this permit, the cumulative monthly individual HAP emissions and cumulative monthly combined HAPs emissions, in tons; and
 - g) After the first 12 calendar months following the issuance of this permit, the rolling, 12-month individual HAP emissions and combined HAPs emissions, in tons.
4. The permittee shall submit quarterly deviation reports that identify:
- a) all deviations of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - (1) all exceedances of the rolling 12-month individual HAP and combined HAP limitations of 9.90 tons and 24.90 tons, respectively, from all emissions units at the facility, combined; and
 - (2) for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAP limitations specified in section B.2.a) from all emissions units at the facility combined.
 - 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 occurred during a calendar quarter, the permittee shall submit a report that states that no deviations occurred during the quarter.

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

Draft Permit-to-Install and Operate

FLEXIBLE FOAM PRODUCTS

Permit Number: P0110055

Facility ID: 0302000288

Effective Date: To be entered upon final issuance

5. The permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR, Part 63, Subpart OOOOOO (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources). The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements has not been delegated to the Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 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 Northwest District Office.

C. Emissions Unit Terms and Conditions

1. P001, SlabstockFoam Production Line

Operations, Property and/or Equipment Description:

Production of flexible and rigid foam on the slabstock foam machine

- 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. None.
 - (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)a., b)(2)a.,b)(2)b., c)(1), c)(2), d)(1),d)(2), e)(2),and f)(1)a.through f)(1)e.
- 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(D)	36.28 lbs of volatile organic compounds (VOC)/hr from VOC-containing materials [See b)(2)d.] 13.10 tons of VOC/rolling, 12-month period from VOC-containing materials Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4] 1,300 lbs of VOC/month from use of VOC-containing cleanup materials in emissions units P001 through P004, combined[See b)(2)e.]

Draft Permit-to-Install and Operate

FLEXIBLE FOAM PRODUCTS

Permit Number: P0110055

Facility ID: 0302000288

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		7.80 tons of VOC/rolling, 12-month period from use of VOC-containing cleanup materials in emissions units P001 through P004, combined See b)(2)a., b)(2)b., c)(1) and c)(2)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2):
 - i. 36.28 lbs of VOC/hr from VOC-containing materials;
 - ii. 13.10 tons of VOC/rolling, 12-month period from VOC-containing materials;
 - iii. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP;
 - iv. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs;
 - v. 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined; and
 - vi. 7.80 tons of VOC/rolling, 12-month period from use of clean up materials in emissions units P001 through P004, combined
- b. The emission limitation of 13.10 tons of VOC/rolling, 12-month period is based on the assumption that 100 percent of the unreacted VOC in the polyol/polymers and amine catalysts is emitted.
- c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
- d. The hourly VOC emission limitation of 36.28 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

- e. The monthly VOC emission limitation of 1,300 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) This permit establishes an operational restriction which limits the quantity of VOC-containing materials employed in this emissions unit. The maximum rolling, 12-month quantity of VOC materials employed in this emission unit is limited by the following equation:

$$\sum_{M=1}^{12} \left[\sum_{i=1}^n (V_i)(T_i) \right] / 2,000 \text{ lbs} \leq 13.10 \text{ tons of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing materials employed in this emissions unit

V_i = VOC content, in percent, by weight of each VOC-containing material employed

T_i = throughput, in tons, of each VOC-containing material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	2.62
1 – 2	5.24
1 – 3	7.86
1 – 4	10.48
1 – 12	13.10

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

- (2) This permit establishes an operational restriction which limits the quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined. The maximum rolling, 12-month quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined, is limited by the following equation:

$$\sum_{i=1}^n [V_i(T_i)] / 2,000 \text{ lbs} \leq 7.80 \text{ tons of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing cleanup materials employed in emissions units P001 through P004, combined;

V_i = VOC content, in lbs/gallon of each VOC-containing cleanup material employed

T_i = throughput, in gallons, of each VOC-containing cleanup material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	1.56
1 – 2	3.12
1 – 3	4.68
1 – 4	6.24
1 – 12	7.80

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following VOC information each month for this emissions unit:

- a. The name and identification number of each VOC-containing material employed;
 - b. The throughput of each VOC-containing material employed, in tons;
 - c. The VOC content of each VOC-containing material employed, in percent by weight;
 - d. The VOC emission rate for each VOC-containing material employed, in tons per month [d)(1)b. times d)(1)c.];
 - e. The total VOC emission rate from all VOC-containing materials employed, in tons [the summation of d)(1)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- (2) The permittee shall collect and record the following VOC information each month for emissions units P001 through P004, combined:
- a. The name and identification number of each VOC-containing cleanup material employed;
 - b. The throughput of each VOC-containing cleanup material employed, in gallons;
 - c. The VOC content of each VOC-containing cleanup material employed, in lbs/gallon;
 - d. The VOC emission rate for each VOC-containing cleanup material employed, in tons per month [d)(2)b. times d)(2)c. times 1 ton/2,000 lbs];
 - e. The total VOC emission rate from all VOC-containing cleanup materials employed, in tons [the summation of d)(2)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- e) Reporting Requirements
- (1) 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.

- (2) The permittee shall submit quarterly deviation 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-month VOC limitation of 13.10 tons for VOC-containing materials for emissions unit P001;
 - ii. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(1) for emissions unit P001;
 - iii. All exceedances of the rolling, 12-month VOC limitation of 7.80 tons for VOC-containing cleanup materials for emissions unit P001 through P004, combined; and
 - iv. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(2) for emissions unit P001 through P004, combined.
 - 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 36.28 lbs of VOC/hr from VOC-containing materials

Applicable Compliance Method: The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with the limitation.

If required, the permittee shall demonstrate compliance in accordance with Methods 1 – 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: 13.10 tons of VOC/rolling, 12-month period from VOC-containing materials

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirements in section d)(1).

- c. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirements in Facility-Wide Term and Condition B.3.

- d. Emission Limitation: 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the monthly VOC emission limitation shall be based upon the record keeping specified in section d)(2).

- e. Emission Limitation: 7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirements in section d)(2).

- g) Miscellaneous Requirements

- (1) None.

2. P002, RebondFoam Production Line

Operations, Property and/or Equipment Description:

Production of rebond foam logs from recycled foam and virgin binder solution, with three cyclones and one baghouse for control of particulate emissions

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

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

a. b)(1)d. and d)(2).

(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)a., b)(2)a., b)(2)b., c)(1), c)(2), c)(3), d)(1), d)(3), d)(4), e)(2), and f)(1)a. through f)(1)g.

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(D)	2.57 lbs of particulate matter less than or equal to 10 microns in diameter (PM ₁₀)/hr and 11.26 tons of PM ₁₀ /yr Visible particulate emissions (PE) shall not exceed 10 percent opacity, as a six-minute average 4.06 lbs of volatile organic compounds (VOC)/hr from VOC-containing materials [See b)(2)f.] 17.90 tons of VOC/rolling, 12-month period from VOC-containing materials

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FLEXIBLE FOAM PRODUCTS

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4]</p> <p>1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined[See b)(2)g.]</p> <p>7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined</p> <p>See b)(2)a.,b)(2)b. and c)(1) through c)(3)</p>
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)d.
d.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(2)
e.	ORC 3704.03(T)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting the potentials to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) through c)(3):
 - i. 2.57 lbs of PM₁₀/hr and 11.26 tons of PM₁₀/yr;
 - ii. Visible PE shall not exceed 10% opacity, as a six-minute average.
 - iii. 4.06 lbs of VOC/hr from VOC-containing materials;
 - iv. 17.90 tons of VOC/rolling, 12-month period from VOC-containing materials;
 - v. HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP;

- vi. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs;
 - vii. 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined; and
 - viii. 7.80 tons of VOC/rolling, 12-month period from use of clean up materials in emissions units P001 through P004, combined
- b. The emission limitation of 17.90 tons of VOC/rolling, 12-month period is based on the assumption that 100 percent of the unreacted VOC in the polyol polymers is emitted.
 - c. The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
 - d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
 - e. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
 - f. The hourly VOC emission limitation of 4.06 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.
 - g. The monthly VOC emission limitation of 1,300 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) This permit establishes an operational restriction which limits the quantity of VOC-containing materials employed in this emissions unit. The maximum rolling, 12-month quantity of VOC materials employed in this emissions unit is limited by the following equation:

$$12 \quad n$$

$$\sum_{M=1} [\sum_{i=1} (V_i)(T_i)] / 2,000 \text{ lbs} \leq 17.90 \text{ tons of VOC per year}$$

$$M=1 \quad i=1$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing materials employed in this emissions unit

Vi = VOC content, in percent, by weight of each VOC-containing material employed

Ti = throughput, in tons, of each VOC-containing material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	3.58
1 – 2	7.16
1 – 3	10.74
1 – 4	14.32
1 – 12	17.90

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

- (2) This permit establishes an operational restriction which limits the quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined. The maximum rolling, 12-month quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined, is limited by the following equation:

$$\sum_{i=1}^n [\sum_{M=1}^{12} (Vi)(Ti)] / 2,000 \text{ lbs} \leq 7.80 \text{ tons of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing cleanup materials employed in emissions units P001 through P004, combined

Vi = VOC content, in lbs/gallon of each VOC-containing cleanup material employed

Ti = throughput, in gallons, of each VOC-containing cleanup material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	1.56
1 – 2	3.12
1 – 3	4.68
1 – 4	6.24
1 – 12	7.80

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

- (3) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)a.]:
 - a. The rebond production line shall employ three cyclones, followed by one baghouse. One cyclone is used for bin Nos. 1 and 2, one cyclone is used for bin Nos. 3 and 4, and one cyclone is used for the weight hopper. The baghouse shall be located downstream of the three cyclones. The baghouse shall comply with a maximum outlet grain loading of 0.01 grains per dry standard cubic foot.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 emissions incident; and

- e. any corrective actions taken to eliminate the visible emissions.
- (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.
- (3) The permittee shall collect and record the following VOC information each month for this emission unit:
- a. The name and identification number of each VOC-containing material employed;
 - b. The throughput of each VOC-containing material employed, in tons;
 - c. The VOC content of each VOC-containing material employed, in percent by weight;
 - d. The VOC emission rate for each VOC-containing material employed, in tons per month [d)(3)b. times d)(3)c.];
 - e. The total VOC emission rate from all VOC-containing materials employed, in tons [the summation of d)(3)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- (4) The permittee shall collect and record the following VOC information each month for emissions units P001 through P004, combined:
- a. The name and identification number of each VOC-containing cleanup material employed;
 - b. The throughput of each VOC-containing cleanup material employed, in gallons;
 - c. The VOC content of each VOC-containing cleanup material employed, in lbs/gallon;
 - d. The VOC emission rate for each VOC-containing cleanup material employed, in tons per month [d)(4)b. times d)(4)c. times 1 ton/2,000 lbs];
 - e. The total VOC emission rate from all VOC-containing cleanup materials employed, in tons [the summation of d)(4)d.];

- f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
- g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit quarterly deviation 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-month VOC limitation of 17.90 tons for VOC-containing materials for emissions unit P002;
 - ii. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(1) for emissions unit P002;
 - iii. All exceedances of the rolling, 12-month VOC limitation of 7.80 tons for VOC-containing cleanup materials for emissions units P001 through P004, combined;
 - iv. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(2) for emissions units P001 through P004, combined;
 - v. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - vi. any corrective actions taken to eliminate the visible particulate emissions.
 - 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 2.57 lbs of PM₁₀/hr and 11.26 tons PM₁₀/yr

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly emission limitation by multiplying the outlet PM₁₀ grain loading emission factor of 0.01 grain per dry standard cubic foot (DSCF)* by the maximum volumetric air flow rate of 30,000 actual cubic feet per minute (ACFM), and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7,000 grains/lb.

*0.01 grain per DSCF is based on the manufacturer's guaranteed value

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A, and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual PM₁₀ limitation was developed by multiplying the hourly PM₁₀ limitation by the maximum operating schedule of 8,760 hrs/yr, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

- b. Emission Limitation: Visible PE shall not exceed 10 percent opacity, as a six-minute average.

Applicable Compliance Method: If required, compliance with the visible emission limitation specified above shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 4.06lbs of VOC/hr from VOC-containing materials

Applicable Compliance Method: The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with the limitation.

If required, the permittee shall demonstrate compliance in accordance with Methods 1 – 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

- d. Emission Limitation: 17.90 tons of VOC/rolling, 12-month period from VOC-containing materials

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirements in section d)(3).

- e. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirement in Facility-Wide Term and Condition B.3.

- f. Emission Limitation: 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the monthly VOC emission limitation shall be based upon the record keeping specified in section d)(2).

- g. Emission Limitation: 7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the record keeping requirements in section d)(4).

g) Miscellaneous Requirements

- (1) None.

3. P003, Foam Fabrication

Operations, Property and/or Equipment Description:

Use of spray on adhesive for foam fabrication activities at various locations in the plant (Looper)

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. None.

(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)a., b)(2)a., b)(2)b., c)(1), c)(2), d)(1), d)(2), e)(2), f)(1)athrough f)(1)e.

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(D)	0.12 lb of volatile organic compounds (VOC)/hr from VOC-containing materials [See b)(2)d.] 0.34 ton of VOC/rolling, 12-month period from VOC-containing materials Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4] 1,300 lbs of VOC/month from the use of VOC-containing clean-up materials in emissions units P001 through P004, combined [See b)(2)e.]

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FLEXIBLE FOAM PRODUCTS

Permit Number: P0110055

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined See b)(2)a., b)(2)b., c)(1) and c)(2)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potentials to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restrictions contained in c)(1) and c)(2):
 - i. 0.12 lb of VOC/hr from VOC-containing materials;
 - ii. 0.34 ton of VOC/rolling, 12-month period from VOC-containing materials;
 - iii. HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP;
 - iv. HAP emissions from all emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs; and
 - v. 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined; and
 - vi. 7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined
- b. The emission limitation of 0.34 ton of VOC/rolling, 12-month period is based on the assumption that 100 percent of the unreacted VOC in the Jowat adhesives is emitted.
- c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
- d. The hourly VOC emission limitation of 0.12 pound was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.
- e. The monthly VOC emission limitation of 1,300 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not

necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) This permit establishes an operational restriction which limits the quantity of VOC-containing materials employed in this emissions unit. The maximum rolling, 12-month quantity of VOC materials employed in this emissions unit is limited by the following equation:

$$\sum_{i=1}^n [\sum_{M=1}^{12} (V_i)(T_i)] / 2,000 \text{ lbs} \leq 0.34 \text{ ton of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing materials employed in this emissions unit

V_i = VOC content, in percent, by weight of each VOC-containing material employed

T_i = throughput, in tons, of each VOC-containing material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	0.068
1 – 2	0.136
1 – 3	0.204
1 – 4	0.272
1 – 12	0.340

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly VOC emission rates.

- (2) This permit establishes an operational restriction which limits the quantity of the VOC-containing cleanup materials employed in emissions units P001 through P004, combined. The maximum rolling, 12-month quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined, is limited by the following equation:

$$\sum_{i=1}^n [\sum_{M=1}^{12} (V_i)(T_i)] / 2,000 \text{ lbs} \leq 7.80 \text{ tons of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing cleanup materials employed in emissions units P001 through P004, combined;

V_i = VOC content, in lbs/gallon of each VOC-containing cleanup material employed

T_i = throughput, in gallons, of each VOC-containing cleanup material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	1.56
1 – 2	3.12
1 – 3	4.68
1 – 4	6.24
1 – 12	7.80

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following VOC information each month for this emission unit:

- a. The name and identification number of each VOC-containing material employed;
 - b. The throughput of each VOC-containing material employed, in tons;
 - c. The VOC content of each VOC-containing material employed, in percent by weight;
 - d. The VOC emission rate for each VOC-containing material employed, in tons per month [d)(1)b. times d)(1)c.];
 - e. The total VOC emission rate from all VOC-containing materials employed, in tons [the summation of d)(1)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- (2) The permittee shall collect and record the following VOC information each month for emissions units P001 through P004, combined:
- a. The name and identification number of each VOC-containing cleanup material employed;
 - b. The throughput of each VOC-containing cleanup material employed, in gallons;
 - c. The VOC content of each VOC-containing cleanup material employed, in lbs/gallon;
 - d. The VOC emission rate for each VOC-containing cleanup material employed, in tons per month [d)(2)b. times d)(2)c. times 1 ton/2,000 lbs];
 - e. The total VOC emission rate from all VOC-containing cleanup materials employed, in tons [the summation of d)(2)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- e) Reporting Requirements
- (1) 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.

- (2) The permittee shall submit quarterly deviation 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-month VOC limitation of 0.34 ton for VOC-containing materials for emissions unit P003;
 - ii. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(1) for emissions unit P003;
 - iii. All exceedances of the rolling, 12-month VOC limitation of 7.80 tons for VOC-containing cleanup materials for emissions unit P001 through P004, combined; and
 - iv. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(2) for emissions units P001 through P004, combined.
 - 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 0.12lb of VOC/hr from VOC-containing materials

Applicable Compliance Method: The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with the limitation.

If required, the permittee shall demonstrate compliance in accordance with Methods 1 – 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: 0.34 ton of VOC/rolling, 12-month period from VOC-containing materials

Applicable Compliance Method: Compliance with the rolling, 12-month period emission limitation shall be demonstrated by the record keeping requirements in section d)(1).

- c. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirement in Facility-Wide Term and Condition B.3.

- d. Emission Limitation: 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the monthly VOC emission limitation shall be based upon the record keeping specified in section d)(2).

- e. Emission Limitation: 7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirements in section d)(2).

- g) Miscellaneous Requirements

- (1) None.

4. P004, Foam Fabrication Booth

Operations, Property and/or Equipment Description:

Foam fabrication booth to manufacture mattress cores in three-sided enclosure, including application of spray on adhesives

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. None.

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

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(D)	4.28 lbs of volatile organic compounds (VOC)/hr from VOC-containing materials [See b)(2)d.] 4.45 tons of VOC/rolling, 12-month period from VOC-containing materials Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4] 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004,

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FLEXIBLE FOAM PRODUCTS

Permit Number: P0110055

Facility ID: 0302000288

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combined [See b)(2)e.] 7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean up materials in emissions units P001 through P004, combined See b)(2)a., b)(2)b., c)(1) and c)(2)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitation for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restrictions contained in c)(1) and c)(2):
 - i. 4.28 lbs of VOC/hr from VOC-containing materials;
 - ii. 4.45 tons of VOC/rolling, 12-month period from VOC-containing materials;
 - iii. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP;
 - iv. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs; and
 - v. 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined; and
 - vi. 7.80 tons of VOC/rolling, 12-month period from use of VOC-containing clean-up materials in emissions units P001 through P004, combined.
- b. The emission limitation of 4.45 ton of VOC/rolling, 12-month period is based on the assumption that 100 percent of the unreacted VOC in the Jowat adhesives is emitted.
- c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
- d. The hourly VOC emission limitation of 4.28 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

- e. The monthly VOC emission limitation of 1,300 pounds was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) This permit establishes an operational restriction which limits the quantity of VOC-containing materials employed in this emission unit. The maximum rolling, 12-month quantity of VOC materials employed in this emission unit is limited by the following equation:

$$\sum_{i=1}^n [(V_i)(T_i)] / 2,000 \text{ lbs} \leq 4.45 \text{ tons of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing materials employed in this emissions unit

V_i = VOC content, in percent, by weight of each VOC-containing material employed

T_i = throughput, in tons, of each VOC-containing material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	0.89
1 – 2	1.78
1 – 3	2.67
1 – 4	3.56
1 – 12	4.45

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

- (2) This permit establishes an operational restriction which limits the quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined. The maximum rolling, 12-month quantity of VOC-containing cleanup materials employed in emissions units P001 through P004, combined, is limited by the following equation:

$$\sum_{i=1}^n \frac{[\sum(V_i)(T_i)]}{2,000 \text{ lbs}} \leq 7.80 \text{ tons of VOC per year}$$

Where:

M = the increment of the rolling, 12-month period

n = the total number of unique VOC-containing cleanup materials employed in emissions units P001 through P004, combined;

V_i = VOC content, in lbs/gallon of each VOC-containing cleanup material employed

T_i = throughput, in gallons, of each VOC-containing cleanup material employed for the rolling, 12-month period

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC emission rates specified in the following table:

Maximum Allowable Cumulative VOC Emission Rates (tons):

Month(s)	VOC Emissions
1 – 1	1.56
1 – 2	3.12
1 – 3	4.68
1 – 4	6.24
1 – 12	7.80

After the first 12 months of operation following the issuance of this permit, compliance with the annual VOC limitation shall be based upon a rolling, 12-month summation of the monthly emission rates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following VOC information each month for this emission unit:

- a. The name and identification number of each VOC-containing material employed;
 - b. The throughput of each VOC-containing material employed, in tons;
 - c. The VOC content of each VOC-containing material employed, in percent by weight;
 - d. The VOC emission rate for each VOC-containing material employed, in tons per month [d)(1)b. times d)(1)c.];
 - e. The total VOC emission rate from all VOC-containing materials employed, in tons [the summation of d)(1)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- (2) The permittee shall collect and record the following VOC information each month for emissions units P001 through P004, combined:
- a. The name and identification number of each VOC-containing cleanup material employed;
 - b. The throughput of each VOC-containing cleanup material employed, in gallons;
 - c. The VOC content of each VOC-containing cleanup material employed, in lbs/gallon;
 - d. The VOC emission rate for each VOC-containing cleanup material employed, in tons per month [d)(2)b. times d)(2)c. times 1 ton/2,000 lbs];
 - e. The total VOC emission rate from all VOC-containing cleanup materials employed, in tons [the summation of d)(2)d.];
 - f. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly VOC emissions, in tons; and
 - g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.
- e) Reporting Requirements
- (1) 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.

- (2) The permittee shall submit quarterly deviation 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-month VOC limitation of 4.45 tons for VOC-containing materials for emissions unit P004;
 - ii. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(1) for emissions unit P004;
 - iii. All exceedances of the rolling, 12-month VOC limitation of 7.80 tons for VOC-containing cleanup materials for emissions unit P001 through P004, combined; and
 - iv. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emission limitations specified in section c)(2) for emissions unit P001 through P004, combined.
 - 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 4.28lbs of VOC/hr from VOC-containing materials

Applicable Compliance Method: The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with the limitation.

If required, the permittee shall demonstrate compliance in accordance with Methods 1 – 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: 4.45 tons of VOC/rolling, 12-month period from VOC-containing materials

Applicable Compliance Method: Compliance with the rolling 12-month period emission limitation shall be demonstrated by the record keeping requirements in section d)(1).

- c. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirements in Facility-Wide Term and Condition B.3.

- d. Emission Limitation: 1,300 lbs of VOC/month from use of VOC-containing clean up materials in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the monthly VOC emission limitation shall be based upon the record keeping specified in section d)(2).

- e. Emission Limitation: 7.80 tons of VOC/rolling, 12-month period from use of clean up solvent in emissions units P001 through P004, combined

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitation shall be demonstrated by the record keeping requirements in section d)(2).

- g) Miscellaneous Requirements

- (1) None.

5. Emissions Unit Group -Storage Tank Group #1 –toluene diisocyanate (TDI): T002,T005,T007

EU ID	Operations, Property and/or Equipment Description
T002	Fixed roof TDI storage tank #C05 with a capacity of 11,532 gallons, controlled by a carbon drum system
T005	Fixed roof TDI storage tank #C12 with a capacity of 6,016 gallons, controlled by a carbon drum system
T007	Fixed roof TDI storage tank #C09 with a capacity of 6,016 gallons, controlled by a carbon drum system

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. None.

(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)a., b)(2)a., c)(1), d)(1), e)(2), f)(1)a. and f)(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.	OAC rule 3745-31-05(D)	0.01 ton of volatile organic compounds (VOC)/rolling, 12-month period from each emissions unit individually Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4] See b)(2)a., c)(1) and c)(2)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restrictions contained in c)(1) and c)(2):
 - i. 0.01 ton of VOC/rolling, 12-month period from each emissions unit individually;
 - ii. HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP; and
 - iii. HAP emissions from all emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs.
- b. Best Available Technology (BAT) requirements for these emissions units have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.

c) Operational Restrictions

(1) The maximum annual material throughput rates shall not exceed the following:

- a. Emissions unit T002 – 78,000,000 gallons, based upon a rolling, 12-month summation of the throughput rates;
- b. Emissions unit T005 – 236,245 gallons, based upon a rolling, 12-month summation of the throughput rates; and
- c. Emissions unit T007 – 236,245 gallons, based upon a rolling, 12-month summation of the throughput rates.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the material throughput rates specified in the following table:

Maximum Allowable Cumulative Material Throughput Rates (gallons):

Month(s)	T002 (gallons)	T005 (gallons)	T007 (gallons)
1 – 1	15,600,000	47,249	47,249
1 – 2	31,200,000	94,498	94,498
1 – 3	46,800,000	141,747	141,747
1 – 4	62,400,000	188,996	188,996
1 – 12	78,000,000	236,245	236,245

After the first 12 months of operation following the issuance of this permit, compliance with the annual material throughput limitations shall be based upon a rolling, 12-month summation of the monthly material throughput rates.

- (2) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)a.i]:
 - a. Emissions units T002, T005 and T007 shall each employ a carbon drum system. The carbon drum system shall maintain a minimum control efficiency of 98 percent. The permittee shall operate the carbon drum system whenever these emissions units are in operation and in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall collect and record the following information each month for each emissions unit T002, T005 and T007:
 - a. The name and identification number of each material stored;
 - b. The tank throughput of each material, in gallons;
 - c. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly tank throughput for each storage tank, in gallons; and
 - d. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the tank throughput, in gallons.

 - (2) The permittee shall maintain daily records that document any time periods when the carbon drum system was not in service when the emissions units were in operation.

- e) **Reporting Requirements**
 - (1) 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.

 - (2) The permittee shall submit quarterly deviation 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 material throughput restriction of 78,000,000 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T002;

- ii. All exceedances of the material throughput restriction of 236,245 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T005;
 - iii. All exceedances of the material throughput restriction of 236,245 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T007;
 - iv. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative material throughput rates specified in section c)(1) for emissions unit T002, T005 and T007; and
 - v. any daily record showing that the carbon drum system was not in service when the emissions units were in operation.
- 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 0.01 ton of VOC/rolling, 12-month period from each emissions unit individually

Applicable Compliance Method: Compliance with the rolling, 12-month period VOC limitation is based on the maximum TDI throughput for each tank listed in term c)(1)a. through c)(1)c. and U.S. EPA's TANKS version 4.09. Therefore, provided compliance is shown with the throughput restriction, compliance with the rolling, 12-month emission limitation shall also be demonstrated.

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FLEXIBLE FOAM PRODUCTS

Permit Number: P0110055

Facility ID: 0302000288

Effective Date: To be entered upon final issuance

- b. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirement in Facility-Wide Term and Condition B.3.

g) Miscellaneous Requirements

- (1) None.

6. Emissions Unit Group -Storage Tank Group #2 - diphenylmethanediisocyanate(MDI): T008,T009

EU ID	Operations, Property and/or Equipment Description
T008	Fixed roof MDI storage tank #C01 with a capacity of 6,016 gallons
T009	Fixed roof MDI storage tank #C22 with a capacity of 6,016 gallons

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. None.

(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)a., b)(2)a., c)(1), d)(1), e)(2),f)(1)a. and f)(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.	OAC rule 3745-31-05(D)	0.01 ton of volatile organic compounds (VOC)/rolling, 12-month period from each emissions unit individually Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4] See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restrictions contained in c)(1):
 - i. 0.01 ton of VOC/rolling, 12-month period from each emissions unit individually;
 - ii. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP; and
 - iii. HAP emissions from all emissions units emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs.
- b. Best Available Technology (BAT) requirements for these emissions units have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.

c) Operational Restrictions

(1) The maximum annual material throughput rates shall not exceed the following,:

- a. Emissions unit T008 – 387,904 gallons, based upon a rolling, 12-month summation of the throughput rates;
- b. Emissions unit T009 – 474,766 gallons, based upon a rolling, 12-month summation of the throughput rates; and

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the material throughput rates specified in the following table:

Maximum Allowable Cumulative Material Throughput Rates (gallons):

Month(s)	T008 (gallons)	T009 (gallons)
1 – 1	77,581	94,953
1 – 2	155,162	189,906
1 – 3	232,742	284,860
1 – 4	310,323	379,813
1 – 12	387,904	474,766

After the first 12 months of operation following the issuance of this permit, compliance with the annual material throughput limitations shall be based upon a rolling, 12-month summation of the monthly material throughput rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each emissions unit T008 and T009:
 - a. The name and identification number of each MDI material stored;
 - b. The tank throughput of each MDI material, in gallons;
 - c. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly tank throughput for each storage tank, in gallons; and
 - d. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the tank throughput, in gallons.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit quarterly deviation 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 material throughput restriction of 387,904 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T008;
 - ii. All exceedances of the material throughput restriction of 474,766 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T009; and
 - iii. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative material throughput rates specified in section c)(1) for emissions unit T008 and T009.
 - 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 0.01 ton of VOC/rolling, 12-month period from each emissions unit individually;

Applicable Compliance Method: Compliance with the rolling, 12-month period VOC limitation is based on the maximum MDI throughput for each tank listed in term c)(1)a. and c)(1)b. and U.S. EPA's TANKS version 4.09. Therefore, provided compliance is shown with the throughput restriction, compliance with the rolling, 12-month emission limitation shall also be demonstrated.

- b. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirements in Facility-Wide Term and Condition B.3.

g) Miscellaneous Requirements

- (1) None.

7. Emissions Unit Group -Storage Tank Group #3 –RebondBinder Solution: T010,T011

EU ID	Operations, Property and/or Equipment Description
T010	Fixed roof rebond binder solution storage tank #C17 with a capacity of 1,500 gallons
T011	Fixed roof rebond binder solution storage tank #C21 with a capacity of 1,500 gallons

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. None.

(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)a., b)(2)a., c)(1), d)(1), e)(2), f)(1)a. and f)(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.	OAC rule 3745-31-05(D)	0.05 ton of volatile organic compounds (VOC)/rolling, 12-month period from each emissions unit individually Hazardous air pollutant (HAP) emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. [See Facility-Wide Terms and Conditions B.2 through B.4] See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restrictions contained in c)(1):
 - i. 0.05 ton of VOC/rolling, 12-month period from each emissions unit individually;
 - ii. HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP; and
 - iii. HAP emissions from all emissions units at the facility, combined, shall not exceed 24.90 tons per rolling, 12-month period for any combination of HAPs.
- b. Best Available Technology (BAT) requirements for these emissions units have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.

c) Operational Restrictions

(1) The maximum annual material throughput rates shall not exceed the following:

- a. Emissions unit T010 – 333,980 gallons, based upon a rolling, 12-month summation of the throughput rates;
- b. Emissions unit T011 – 333,980 gallons, based upon a rolling, 12-month summation of the throughput rates; and

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the material throughput rates specified in the following table:

Maximum Allowable Cumulative Material Throughput Rates (gallons):

Month(s)	T008 (gallons)	T009 (gallons)
1 – 1	66,796	66,796
1 – 2	133,592	133,592
1 – 3	200,388	200,388
1 – 4	267,184	267,184
1 – 12	333,980	333,980

After the first 12 months of operation following the issuance of this permit, compliance with the annual material throughput limitations shall be based upon a rolling, 12-month summation of the monthly material throughput rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each emissions unit T010 and T011:
 - a. The name and identification number of each rebond binder solution stored;
 - b. The tank throughput of each rebond binder solution, in gallons;
 - c. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative monthly tank throughput for each storage tank, in gallons; and
 - d. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the tank throughput, in gallons.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit quarterly deviation 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 material throughput restriction of 333,980 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T010;
 - ii. All exceedances of the material throughput restriction of 333,980 gallons, based upon a rolling, 12-month summation of the material throughput rates for emissions unit T011; and
 - iii. For the first 12 months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative material throughput rates specified in section c)(1) for emissions unit T010 and T011.
 - 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, the permittee 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 Northwest District Office).

- (3) 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.

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: 0.05 ton VOC/rolling, 12-month period from each emissions unit individually

Applicable Compliance Method: Compliance with the rolling, 12-month period VOC limitation is based on the maximum rebond binder solution throughput for each tank listed in term c)(1)a. and c)(1)b. and U.S. EPA's TANKS version 4.09. Therefore, provided compliance is shown with the throughput restriction, compliance with the rolling, 12-month emission limitation shall also be demonstrated.

- b. Emission Limitation: HAP emissions from all emissions units at the facility, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance with the rolling, 12-month emission limitations shall be demonstrated by the record keeping requirement in Facility-Wide Term and Condition B.3.

g) Miscellaneous Requirements

- (1) None.