



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WYANDOT COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 03-13782

DATE: 2/4/2003

Bridgestone APM Company
Joseph Clark
PO Box 1505 1800 Industrial Drive
Findlay, OH 45839

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 2/4/2003
Effective Date: 2/4/2003**

FINAL PERMIT TO INSTALL 03-13782

Application Number: 03-13782
APS Premise Number: 0388010051
Permit Fee: **\$200**
Name of Facility: Bridgestone APM Company
Person to Contact: Joseph Clark
Address: PO Box 1505 1800 Industrial Drive
Findlay, OH 45839

Location of proposed air contaminant source(s) [emissions unit(s)]:

**245 Commerce Way
Upper Sandusky, Ohio**

Description of proposed emissions unit(s):

Modification to 2 polyurethane foam lines for production of automotive seat cushions.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Record keeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

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calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

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

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5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC | 117.97 |
| NO _x | 13.49 |
| PE | 0.44 |

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

P005 - Polyurethane foam seat line 2- mixing, mold waxing, pouring with cure oven, demold, crushing and post-cure oven operation (modification to PTI 03-13465, issued 11/7/00). Modification involves correcting emission limitations and combining post-cure oven emissions with P006.

See Below

Pouring with cure oven

Mold waxing

OAC rule 3745-31-05(A)(3)

Post-cure oven

Emissions Unit ID: **P005**

| | <u>Applicable Emissions Limitations/Control Measures</u> | |
|---------------------------|--|--|
| OAC rule 3745-17-11(B) | | See Section A.I.2.d. |
| OAC rule 3745-17-07(B) | See Below | See Section A.I.2.e. |
| OAC rule 3745-21-07(G)(2) | | See Section A.I.2.f. |
| OAC rule 3745-31-05(A) | | See Section A.I.2.g. |
| | | See Section A.I.2.h. |
| | | Combined limits of 0.40 lb NO _x /hour and 1.75 tons NO _x /year with P006 |
| OAC rule 3745-21-07(G)(1) | | See Section A.I.2.j. |
| OAC rule 3745-21-07(G)(2) | Control requirements (See Section A.I.2.a) | See Section A.I.2.i. |
| OAC rule 3745-23-06(B) | 13.15 lbs organic compounds | See Section A.I.2.e. |
| OAC rule 3745-17-11(B) | (OC)/hour, 57.60 tons OC/year | 0.020 lb PE/mmBtu |
| OAC rule 3745-17-07(A) | 0.05 lb particulate emissions | Visible PE shall not exceed 20% opacity |
| OAC rule 3745-18-06 | (PE)/hour, 0.22 ton PE/year | as a six-minute average |
| OAC rule 3745-18-06 | Visible PE shall not exceed 0% | See Section A.I.2.h. |
| OAC rule 3745-31-05(A) | opacity as a six-minute average | |
| OAC rule 3745-31-05(A) | See Section A.I.2.c. | |
| OAC rule 3745-31-05(A) | See Section A.I.2.c. | |
| OAC rule 3745-31-05(A) | See Section A.I.2.d. | |
| OAC rule 3745-21-07(G)(1) | | |
| OAC rule 3745-23-06(B) | Control requirements (See Section A.I.2.a) | |
| OAC rule 3745-17-10(B) | 0.28 lb OC/hour, 1.23 tons OC/year | |
| OAC rule 3745-17-07(A) | 1.34 lbs nitrogen oxides (NO _x)/hour, | |
| OAC rule 3745-18-06 | 5.87 tons NO _x /year | |
| OAC rule 3745-18-06 | See Section A.I.2.c | |

2. Additional Terms and Conditions

- 2.a** Best available technology (BAT) for this emissions unit has been determined to be use of a carbon mat filter for PE control for mold waxing and a carbon adsorber for OC control from pouring operations. The carbon adsorber shall meet a minimum removal efficiency of 90% (100% capture efficiency)
- 2.b** The permittee has requested combined emission limitations for the post-cure oven associated with emissions units P005 and P006 since both emissions units share this oven.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The requirements of OAC rule 3745-21-07(G)(2) are not applicable because the facility employs only non-photochemically reactive materials in its mold waxing and pouring operation (see Section A.II.1).
- 2.e** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A) (3) in this permit to install.
- 2.f** The uncontrolled mass rate of particulate emissions* from pouring with cure oven operations is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- * The burning of natural gas is the only source of PE from pouring with cure oven operations.
- 2.g** Pouring with cure oven operations is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because pouring with cure oven operations is not subject to the requirements of OAC rule 3745-17-11.
- 2.h** This operation is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(B).
- 2.i** OAC rule 3745-21-07(G)(1) is not applicable to post-cure oven operations since a liquid organic material is not employed.
- 2.j** The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-07(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the carbon mat filter whenever this emissions unit is in operation.
3. The activated carbon bed in the final compartment of the adsorber shall not exceed the following:
 - a. An apparent density value to be determined during required performance testing of carbon adsorber.
 - b. A moisture content to be determined during required performance testing.
4. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the carbon mat filter was not in service when the emissions unit was in operation.
2.
 - a. The permittee shall perform analyses of the apparent density and moisture content of the activated carbon in the adsorber by methods as approved by the Director. The analyses shall be performed at the midpoint of the carbon bed once every two months.
 - b. For each analyses of the apparent density and moisture content, the permittee shall determine if the carbon bed has experienced breakthrough at the midpoint indicating that the entire carbon bed has reached its half life. At the time when analyses indicate the entire carbon bed has reached its half life, analyses of the apparent density and moisture content of the activated carbon shall be performed in the final compartment of the adsorber once every month.
 - c. Monthly analyses of the activated carbon in the final compartment, as required in section A.III.2.b, will be required until the carbon bed is replaced, at which time the permittee shall analyses in accordance with section A.III.2.a.
3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

4. The permittee shall collect and record the following information each month for mold waxing material usage in emissions unit P005:
 - a. The company identification for each mold waxing material employed;
 - b. Documentation on whether or not each mold waxing material is a photochemically reactive material;
 - c. The number of pounds of each mold waxing material employed;
 - d. The organic compound content, in percent weight, for each mold waxing material, as applied;
 - e. The organic compound emission rate for each mold waxing material employed, in lbs/month \times d for each mold waxing material employed);
 - f. The total organic compound emission rate for all mold waxing material employed, in tons/month (sum of e for all mold waxing materials); and
 - g. The annual, year to date organic compound emissions from all mold waxing materials employed, in tons/year (sum of f for each calendar month to date from January to December).

5. The permittee shall collect and record the following information each month for pouring operations in emissions unit P005:
 - a. The company identification for each pouring material and catalyst employed;
 - b. Documentation on whether or not each pouring material and catalyst is a photochemically reactive material;
 - c. The number of pounds of each pouring catalyst employed;
 - d. The organic compound content, in percent weight, for each pouring catalyst, as applied;
 - e. The organic compound emission rate for each pouring catalyst employed, in lbs/month \times d for each pouring catalyst employed);
 - f. The total organic compound emission rate for all pouring catalyst employed, in tons/month (sum of e for all pouring catalysts);
 - g. The organic compound content of each pouring material, as applied, in lbs/gal;
 - h. The number of gallons of each pouring material employed;

- i. The organic compound emission rate for each pouring material employed, in lbs/month (g x h for each pouring material employed);
- j. The total organic compound emission rate for all pouring materials employed, in tons/month (sum of i for all pouring materials);
- k. The annual, year to date organic compound emissions from all pouring catalysts and pouring materials employed, in tons/year (sums of f and j for each calendar month to date from January to December).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the carbon mat filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the apparent density and moisture content restrictions described in section A.III.3. These deviation reports shall be submitted in accordance with the general terms and conditions of this permit.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily showing that the carbon mat filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual organic compound emission limitations in section A.I.1, as well as the corrective actions taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the

previous calendar year.

6. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted in compliance within 3 months after the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the 90% VOC control efficiency and 100% VOC capture efficiency. Emission testing shall also be conducted to demonstrate compliance with lb/hr limitation for OC from pouring.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the control efficiency for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
 - e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test

methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
13.15 lbs OC/hour for mold waxing

Applicable Compliance Method

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

*The potential to emit is based on a maximum gallon usage of 2.12 gals/hr and a maximum VOC content of 6.20 lbs/gal.

- b. **Emission Limitation**
57.60 tons OC/year for mold waxing

Applicable Compliance Method

Compliance with the ton/yr limitation shall be determined by the record keeping in section A.III.4.

c. **Emission Limitation**

0.05 lb PE/hour for mold waxing

Applicable Compliance Method

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

$$E \text{ (hourly)} = \frac{\text{(maximum coating solids content in lbs/gal)} \text{ (maximum gallon usage rate)}}{(1 - \text{CE for carbon mat filter})}$$

where:

$$E \text{ (hourly)} = \text{PE rate in lbs/hr}$$

$$\text{Maximum Coating Solids Content} = 0.23 \text{ lb/gal}$$

$$\text{Maximum Gallon Usage Rate} = 2.00 \text{ gals/hr}$$

CE = Control Efficiency of the control equipment (assumed to be 90% for carbon mat filter)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

d. **Emission Limitation:**

0.22 ton PE/year for mold waxing

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

e. **Emission Limitation**

Visible PE shall not exceed 0% opacity as a six-minute average for waxing operations

Applicable Compliance Method

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

f. **Emission Limitation**

0.35 lb OC/hour from pouring with cure oven operations

Applicable Compliance Method

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

$$E \text{ (hourly)} = [(\text{Maximum pound usage rate, catalyst})(\text{Percent weight OC, catalyst})] + [(\text{Maximum gallon usage rate, TDI})(\text{Maximum OC content, TDI})] + [(\text{Maximum gallon usage rate, Mesamoll})(\text{Maximum OC content, Mesamoll})] (1 - \text{CE for carbon adsorber})$$

where:

$$E \text{ (hourly)} = \text{OC rate in lbs/hr}$$

$$\text{Maximum pound usage rate, catalyst} = 30.10 \text{ lbs/hr}$$

$$\text{Percent weight OC, catalyst} = 0.065\%$$

$$\text{Maximum gallon usage rate, TDI} = 22 \text{ gals/hr}$$

$$\text{Maximum OC content, TDI} = 0.068 \text{ lb OC/gal}$$

$$\text{Maximum gallon usage rate, Mesamoll} = 0.30 \text{ gal/hr}$$

$$\text{Maximum OC content, Mesamoll} = 0.011 \text{ lb OC/gal}$$

CE = Control Efficiency of the control equipment (assumed to be 90% for carbon adsorber)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

g. **Emission Limitation**

1.54 tons OC/year from pouring with cure oven operations

Applicable Compliance Method

The ton/yr limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hr/year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the

annual limitation.

h. **Emission Limitation**

1.34 lbs nitrogen oxides (NO_x)/hour from pouring with cure oven operations

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by multiplying an emission factor of 100 lb NO_x/mmscf [AP-42, Chapter 1, Table 1.4-1 (7/98)] by a maximum usage capacity of 13400 cf/hr. If required, compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures in US EPA Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

i. **Emission Limitation**

5.87 tons NO_x/year from pouring with cure oven operations

Applicable Compliance Method

The ton/yr limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hr/year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

j. **Emission Limitation**

Combined limits of 0.40 lb NO_x/hour and 1.75 tons NO_x/year with P006 for post-cure oven

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by multiplying an emission factor of 100 lb NO_x/mmscf [AP-42, Chapter 1, Table 1.4-1 (7/98)] by a maximum usage capacity of by 4000 cf/hr. If required, compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 7.

The ton/yr limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hr/year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

k. **Emission Limitation:**

0.020 lb PE/mmBtu

Bridgestone APM Company
PTI Application: 02 12702
Issued

Facility ID: 0388010051

Emissions Unit ID: **P005**

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by dividing the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft by a heat content for natural gas of 950 Btu/cf.

If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

1. **Emission Limitation:**

Visible PE shall not exceed 20% opacity as a six-minute average from the post-cure oven

Applicable Compliance Method:

If required compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| P005 - Polyurethane foam seat line 2 -mixing, mold waxing, pouring with cure oven, demold, crushing and post-cure operation (modification to PTI 03-13465, issued 11/7/00). Modification involves correcting emission limitations and combining post-cure oven emissions with P006. | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

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Bridge

PTI A

Issued: 2/4/2003

Emissions Unit ID: **P005**

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> |
|---|--------------------------------------|
| <p>P006 - Polyurethane foam seat line 1 -mixing, mold waxing, pouring with cure oven, demold, crushing, and post-cure operation (modification to PTI 03-11220, issued 10/28/98). Modification involves combining emissions units P001-P003, correcting emission limitations and combining post-cure oven emissions with P005.</p> | <p>See Below</p> |
| <p>Mold waxing</p> | <p>OAC rule 3745-31-05(A)(3)</p> |
| <p>Post-cure oven</p> | |

Emissions Unit ID: **P006**

| | <u>Applicable Emissions Limitations/Control Measures</u> | |
|---------------------------|--|---|
| OAC rule 3745-17-11(B) | | See Section A.I.2.d. |
| OAC rule 3745-17-07(B) | See Below | See Section A.I.2.e. |
| OAC rule 3745-21-07(G)(2) | | See Section A.I.2.f. |
| OAC rule 3745-31-05(A) | | See Section A.I.2.g. |
| | | See Section A.I.2.h. |
| | | Combined limits of 0.40 lb NO _x /hour and 1.75 tons NO _x /year with P006 |
| OAC rule 3745-21-07(G)(1) | | See Section A.I.2.j. |
| OAC rule 3745-21-07(G)(2) | | |
| OAC rule 3745-23-06(B) | Control requirements (See Section A.I.2.a.) | See Section A.I.2.i. |
| OAC rule 3745-17-11(B) | 13.15 lbs organic compounds (OC)/hour, 57.60 tons OC/year | See Section A.I.2.e. 0.020 lb PE/mmBtu |
| OAC rule 3745-17-07(A) | 0.05 lb particulate emissions | Visible PE shall not exceed 20% opacity as a six-minute average |
| OAC rule 3745-18-06 | (PE)/hour, 0.22 ton PE/year | |
| | Visible PE shall not exceed 0% | See Section A.I.2.h. |
| OAC rule 3745-31-05(A) | opacity as a six-minute average | |
| | See Section A.I.2.c. | |
| | See Section A.I.2.c. | |
| OAC rule 3745-21-07(G)(1) | See Section A.I.2.d. | |
| OAC rule 3745-23-06(B) | | |
| OAC rule 3745-17-10(B) | Control requirements (See Section A.I.2.a.) | |
| OAC rule 3745-17-07(A) | 0.28 lb OC/hour, 1.23 tons OC/year | |
| OAC rule 3745-18-06 | 1.34 lbs nitrogen oxides (NO _x)/hour, 5.87 tons NO _x /year | |
| | See Section A.I.2.c. | |

2. Additional Terms and Conditions

- 2.a** Best available technology (BAT) for this emissions unit has been determined to be use of a carbon mat filter for PE control for mold waxing and a carbon adsorber for OC control from pouring operations. The carbon adsorber shall meet a minimum removal efficiency of 90% (100% capture efficiency)
- 2.b** The permittee has requested combined emission limitations for the post-cure oven associated with emissions units P005 and P006 since both emissions units share this oven.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The requirements of OAC rule 3745-21-07(G)(2) are not applicable because the facility employs only non-photochemically reactive materials in its mold waxing and pouring operation (see Section A.II.1).
- 2.e** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A) (3) in this permit to install.
- 2.f** The uncontrolled mass rate of particulate emissions* from pouring with cure oven operations is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- * The burning of natural gas is the only source of PE from pouring with cure oven operations.
- 2.g** Pouring with cure oven operations is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because pouring with cure oven operations is not subject to the requirements of OAC rule 3745-17-11.
- 2.h** This operation is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(B).
- 2.i** OAC rule 3745-21-07(G)(1) is not applicable to post-cure oven operations since a liquid

organic material is not employed.

- 2.j** The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-07(C)(5), in this emissions unit is prohibited.
2. The permittee shall operate the carbon mat filter wherever this emissions unit is in operation.
3. The activated carbon bed in the final compartment of the adsorber shall not exceed the following:
 - a. An apparent density value to be determined during required performance testing of carbon adsorber.
 - b. A moisture content to be determined during required performance testing.
4. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the carbon mat filter was not in service when the emissions unit was in operation.
2.
 - a. The permittee shall perform analyses of the apparent density and moisture content of the activated carbon in the adsorber by methods as approved by the Director. The analyses shall be performed at the midpoint of the carbon bed once every two months.
 - b. For each analyses of the apparent density and moisture content, the permittee shall determine if the carbon bed has experienced breakthrough at the midpoint indicating that the entire carbon bed has reached its half life. At the time when analyses indicate the entire carbon bed has reached its half life, analyses of the apparent density and moisture content of the activated carbon shall be performed in the final compartment of the adsorber once every month.
 - c. Monthly analyses of the activated carbon in the final compartment, as required in section

Emissions Unit ID: **P006**

A.III.2.b, will be required until the carbon bed is replaced, at which time the permittee shall analyses in accordance with section A.III.2.a.

3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall collect and record the following information each month for mold waxing material usage in emissions unit P006:
 - a. The company identification for each mold waxing material employed;
 - b. Documentation on whether or not each mold waxing material is a photochemically reactive material;
 - c. The number of pounds of each mold waxing material employed;
 - d. The organic compound content, in percent weight, for each mold waxing material, as applied;
 - e. The organic compound emission rate for each mold waxing material employed, in lbs/month (c x d for each mold waxing material employed);
 - f. The total organic compound emission rate for all mold waxing material employed, in tons/month (sum of e for all mold waxing materials); and
 - g. The annual, year to date organic compound emissions from all mold waxing materials employed, in tons/year (sum of f for each calendar month to date from January to December).
5. The permittee shall collect and record the following information each month for pouring operations in emissions unit P006:
 - a. The company identification for each pouring material and catalyst employed;
 - b. Documentation on whether or not each pouring material and catalyst is a photochemically reactive material;
 - c. The number of pounds of each pouring catalyst employed;
 - d. The organic compound content, in percent weight, for each pouring catalyst, as applied;
 - e. The organic compound emission rate for each pouring catalyst employed, in lbs/month (c x d for each pouring catalyst employed);
 - f. The total organic compound emission rate for all pouring catalyst employed, in

- tons/month (sum of e for all pouring catalysts);
- g. The organic compound content of each pouring material, as applied, in lbs/gal;
 - h. The number of gallons of each pouring material employed;
 - i. The organic compound emission rate for each pouring material employed, in lbs/month (g x h for each pouring material employed);
 - j. The total organic compound emission rate for all pouring materials employed, in tons/month (sum of i for all pouring materials);
 - k. The annual, year to date organic compound emissions from all pouring catalysts and pouring materials employed, in tons/year (sums of f and j for each calendar month to date from January to December).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the carbon mat filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the apparent density and moisture content restrictions described in section A.III.3. These deviation reports shall be submitted in accordance with the general terms and conditions of this permit.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily showing that the carbon mat filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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5. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual organic compound emission limitations in section A.I.1, as well as the corrective actions taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report which states that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
6. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the 90% VOC control efficiency and 100% VOC capture efficiency. Emission testing shall also be conducted to demonstrate compliance with lb/hr limitation for OC from pouring.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the control efficiency for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District

Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
13.15 lbs OC/hour for mold waxing

Applicable Compliance Method

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

*The potential to emit is based on a maximum gallon usage of 2.12 gals/hr and a maximum VOC content of 6.20 lbs/gal.

Emissions Unit ID: P006

- b. **Emission Limitation**
 57.60 tons OC/year for mold waxing

Applicable Compliance Method

Compliance with the ton/yr limitation shall be determined by the record keeping in section A.III.4.

- c. **Emission Limitation**
 0.05 lb PE/hour for mold waxing

Applicable Compliance Method

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

$$E \text{ (hourly)} = \frac{\text{(maximum coating solids content in lbs/gal)} \text{ (maximum gallon usage rate)}}{1 - \text{CE for carbon mat filter}}$$

where:

$$E \text{ (hourly)} = \text{PE rate in lbs/hr}$$

$$\text{Maximum Coating Solids Content} = 0.23 \text{ lb/gal}$$

$$\text{Maximum Gallon Usage Rate} = 2.00 \text{ gals/hr}$$

CE = Control Efficiency of the control equipment (assumed to be 90% for carbon mat filter)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

- d. **Emission Limitation:**
 0.22 ton PE/year for mold waxing

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. **Emission Limitation**
 Visible PE shall not exceed 0% opacity as a six-minute average for waxing operations

Applicable Compliance Method

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

- f. **Emission Limitation**
 0.28 lb OC/hour from pouring with cure oven operations

Applicable Compliance Method

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

$$E \text{ (hourly)} = [(\text{Maximum pound usage rate, catalyst})(\text{Percent weight OC, catalyst})] + [(\text{Maximum gallon usage rate, TDI})(\text{Maximum OC content, TDI})] + [(\text{Maximum gallon usage rate, Mesamoll})(\text{Maximum OC content, Mesamoll})] (1 - \text{CE for carbon adsorber})$$

where:

$$E \text{ (hourly)} = \text{OC rate in lbs/hr}$$

$$\text{Maximum pound usage rate, catalyst} = 20.50 \text{ lbs/hr}$$

$$\text{Percent weight OC, catalyst} = 0.065\%$$

$$\text{Maximum gallon usage rate, TDI} = 22 \text{ gals/hr}$$

$$\text{Maximum OC content, TDI} = 0.068 \text{ lb OC/gal}$$

$$\text{Maximum gallon usage rate, Mesamoll} = 0.30 \text{ gal/hr}$$

$$\text{Maximum OC content, Mesamoll} = 0.011 \text{ lb OC/gal}$$

CE = Control Efficiency of the control equipment (assumed to be 90% for carbon adsorber)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

- g. **Emission Limitation**

Emissions Unit ID: P006

1.23 tons OC/year from pouring with cure oven operations

Applicable Compliance Method

The ton/yr limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hr/year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

h. **Emission Limitation**

1.34 lbs nitrogen oxides (NO_x)/hour from pouring with cure oven operations

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by multiplying an emission factor of 100 lb NO_x/mmscf by 13400 cf/hr [AP-42, Chapter 1, Table 1.4-1 (7/98)]. If required, compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 7.

i. **Emission Limitation**

5.87 tons NO_x/year from pouring with cure oven operations

Applicable Compliance Method

The ton/yr limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hr/year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

j. **Emission Limitation**

Combined limits of 0.40 lb NO_x/hour and 1.75 tons NO_x/year with P005 for post-cure oven

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by multiplying an emission factor of 100 lb NO_x/mmscf by 4000 cf/hr [AP-42, Chapter 1, Table 1.4-1 (7/98)]. If required, compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-4 and 7.

The ton/yr limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hr/year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

k. **Emission Limitation**

0.020 lb PE/mmBtu

Applicable Compliance Method

The permittee may demonstrate compliance with this emission limitation by dividing the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft by a heat content for natural gas of 950 Btu/cf.

If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

1. **Emission Limitation:**

Visible PE shall not exceed 20% opacity as a six-minute average from the post-cure oven

Applicable Compliance Method:

If required compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| P006 - Polyurethane foam seat line 1 -mixing, mold waxing, pouring with cure oven, demold, crushing, and post-cure operation (modification to PTI 03-11220, issued 10/28/98). Modification involves combining emissions units P001-P003, correcting emission limitations and combining post-cure oven emissions with P006. | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

Bridgestone APM Company
PTI Application: 02 12702
Issued

Facility ID: 0388010051

Emissions Unit ID: **P006**

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13782 Facility ID: 0388010051

FACILITY NAME Bridgestone APM Company

FACILITY DESCRIPTION Automotive foam seat cushion manufacturer CITY/TWP Upper Sandusky

SIC CODE 2531 SCC CODE 3-08-008-02 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION Polyurethane foam seat line 2 (mixing, mold waxing, pouring with cure oven, demold, crushing and post-cure operation)

DATE INSTALLED 6/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | Attainment | 0.05 lb/hr | 0.22 TPY | 0.05 lb/hr | 0.22 TPY |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | Attainment | | | | |
| Organic Compounds | Attainment | 13.15 lb/hr-waxing 0.28 lb/hr-pouring | 57.60 TPY-waxing 1.23 TPY-pouring | 13.15 lb/hr-waxing 0.28 lb/hr-pouring | 57.60 TPY-waxing 1.23 TPY-pouring |
| Nitrogen Oxides | Attainment | 1.34 lb/hr-pouring 0.40 lb/hr-combined with P006 | 5.87 TPY-pouring 1.75 TPY-combined with P006 | 1.34 lb/hr-pouring 0.40 lb/hr-combined with P006 | 5.87 TPY-pouring 1.75 TPY-combined with P006 |
| Carbon Monoxide | Attainment | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NA

NESHAP? NA

PSD? NA

OFFSET POLICY? NA

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**Enter Determination** Use of carbon mat filters for mold release, use of carbon adsorber for pouring, compliance with terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NA

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

