



A. Source Description

Norcold, Inc. manufactures refrigeration units for recreational vehicles. Norcold uses polyurethane foam lines to produce the thermal insulation within the refrigeration units.

With this application, Norcold is applying to install a new polyurethane foam line (the door carousel). Unlike the existing foam lines, this new line operates with a carousel unit which will improve efficiency, minimize handling, improve curing, and reduce operating expenses.

Emissions from the door carousel foam line are organic compounds (OC). Specifically, the pollutant is chlorodifluoromethane (HCFC or R-22). HCFC is not defined as a volatile organic compound (VOC).

B. Facility Emissions and Attainment Status

Norcold is currently a synthetic minor facility. The synthetic minor status was accomplished through PTI 05-09501 which limits OC emissions to 168.3 tons from the polyurethane foam lines. The installation of this new source, the polyurethane foam door carousel, will not increase facility-wide OC emissions. Norcold has requested that this new unit be included within the synthetic minor limit of 168.3 tons for OC emissions. As a result, the overall facility-wide potential to emit for OC is well below the major new source review threshold for attainment areas of 250 tons.

Norcold, Inc. is located at 600 S. Kuther Street, Sidney, Ohio, Shelby County. At this time, Shelby County is designated attainment for all criteria pollutants.

C. Source Emissions

The polyurethane foam line is used to create a rigid foam insulation material within a refrigeration unit. To accomplish the final product, Norcold sprays solvent containing liquid materials into the assembled refrigeration unit. The liquid materials cure to form the insulation foam. During the cure process, a portion of the solvent is released to the atmosphere. The solvents employed contain organic compounds which are not defined as volatile organic compounds.

The potential OC emissions from the polyurethane foam door carousel are 53 tons. Irrespective of the 53 tons of OC emissions, the overall facility-wide emissions will not increase. This permit will continue to effectively limit OC emissions to 168.3 tons for the polyurethane foam lines. This is possible due to the discontinued use and eventual removal of two current polyurethane foam lines.

D. Conclusion

This Synthetic Minor PTI will effectively restrict the potential OC emissions from all the polyurethane foam lines at this facility. As a result, the installation of the polyurethane foam door carousel unit, emissions unit P016, will not increase facility-wide OC emissions.

A combination of rolling, 12-month material usage limitations, a monthly-average OC content limitation, rolling 12-month OC emission limitations, monthly record keeping requirements, and quarterly deviation reporting requirements shall ensure that compliance with the emissions limitation is maintained.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
SHELBY COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 05-13209

DATE: 5/4/2004

Norcold, Inc
Carol Bonner
600 South Kuther Road
Sidney, OH 453658840

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

SWDO

IN

SHELBY COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **05-13209** FOR AN AIR CONTAMINANT SOURCE FOR
NORCOLD, INC

On 5/4/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Norcold, Inc**, located at **600 S Kuther Rd, Sidney**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-13209:

Polyurethane foaming door carousel.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Phil Hinrichs, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]



**Permit To Install
Terms and
Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 05-13209

Application Number: 05-13209
APS Premise Number: 0575010146
Permit Fee: **To be entered upon final issuance**
Name of Facility: Norcold, Inc
Person to Contact: Carol Bonner
Address: 600 South Kuther Road
Sidney, OH 453658840

Location of proposed air contaminant source(s) [emissions unit(s)]:
**600 S Kuther Rd
Sidney, Ohio**

Description of proposed emissions unit(s):
Polyurethane foaming door carousel.

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

Norcold, Inc

Facility ID: 0575010146

PTI Application: 05-13209

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping 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 recordkeeping 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 recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the 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 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, recordkeeping, 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.

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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

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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

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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.

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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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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

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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.

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

Norco

PTI A

Emissions Unit ID: P016

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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	168.3

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Norco

PTI A

Emissions Unit ID: P016

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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.

Norco
PTI A

Emissions Unit ID: P016

Issued: To be entered upon final issuance

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>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Polyurethane foaming door carousel	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 12.2 pounds per hour nor 53.4 tons per year.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements in OAC rule 3745-21-07(G) and 3745-31-05(C).
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	See A.II. Operational Restrictions OC emissions shall not exceed 168.3 tons per rolling, 12-month summation for emissions units P007, P008, P009, P010, P011, P013, P014, P015 and P016, combined.

2. **Additional Terms and Conditions**

- 2.a The OC emission limitations of 12.2 lbs/hr and 53.1 tons per year are established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual polyurethane foam usage shall not exceed 1,977.6 tons per rolling, 12-

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month summation for emissions unit P007, P008, P009, P010, P011, P013, P014, P015 and P016, combined.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

2. The OC content in the polyurethane foam employed shall not exceed 18.5%, by weight, as a monthly-weighted average. (The OC content is equivalent to weight percent of blowing agent, i.e., chlorodifluoromethane (HCFC or R-22).)
3. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P007, P008, P009, P010, P011, P013, P014, P015 and P016, combined:
 - a. the name and identification number of each polyurethane foam material employed;
 - b. the amount of each polyurethane material employed, in tons;
 - c. the total amount of all polyurethane material employed, in tons;
 - d. the rolling, 12-month summation of all polyurethane materials employed, in tons;
 - e. the OC content, by weight, of each polyurethane material employed;
 - f. the total amount of OC materials employed, i.e., sum of (b)(e) for each polyurethane materials employed;
 - g. the monthly-weighted average OC content of the polyurethane materials employed, i.e., (f)/(c);
 - h. the OC emissions, i.e., (c)(g)(0.46*); and
 - i. the rolling, 12-month summation of OC emissions.

* 0.46 = loss factor derived by the permittee based on information found in the document titled "HCFC Emission Reporting Guidelines Notebook from the Society of the Plastics Industry, Inc., 1995"

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2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each polyurethane foam material employed; and
 - b. whether or not the material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following:
 - a. all exceedances of the rolling, 12-month polyurethane foam usage limitation of 1977.6 tons; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons for emissions units P007, P008, P009, P010, P011, P013, P014, P015 and P016, combined.

These quarterly deviation reports are due by the dates specified in Part I - General Terms and Conditions A.1.

2. The permittee shall notify the Director, in writing, of any monthly record showing an exceedance of the monthly-average OC content limitation of 18.5%, by weight. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the exceedance occurred.
3. The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

V. Testing Requirements

Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:
12.2 pounds OC per day

Applicable Compliance Method:

Compliance with the hourly OC limitations may be determined by using the following calculation:

$$E = (0.46 \text{ loss factor})[(U_a)(\%OC_a) + (U_b)(\%OC_b)]$$

where,

E = OC emissions, in pounds per hour

U_a = usage of A-side material, in pounds (maximum usage 64.14 lbs/hr)

%OC_a = the percent OC content within A-side material, by weight (maximum 10%)

U_b = usage of B-side material, in pounds (maximum usage 83.09 lbs/hr)

%OC_b = the percent OC content within B-side material, by weight (maximum 24%)

2. Emission Limitation:
53.4 tons OC per year

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Applicable Compliance Method:

Compliance with the annual OC limitation may be determined by multiplying the maximum hourly OC emission rate, 12.2 pounds, by 8,760 hours per year, and convert pounds to tons by dividing the result by 2000 lbs/ton.

3. Emission Limitation:
168.3 tons OC per rolling, 12-month summation for emissions units P007, P008, P009, P010, P011, P013, P014, P015 and P016, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.1. of this permit.

VI. Miscellaneous Requirements

The amounts of methylene diphenyl diisocyanate (MDI) and polymeric methylene diphenyl diisocyanate (PMDI) employed in this emissions unit have been determined to be negligible. This determination was derived from guidance for emission estimates documented in "MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry, from the Polyurethane Division of the Society of the Plastics Industry, Inc., 1996."

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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>
P016 - Polyurethane foaming door carousel		

2. Additional Terms and Conditions

2.a

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P016) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Chlorodifluoromethane (HCFC or R-22)

TLV (mg/m3): 3,536.6

Maximum Hourly Emission Rate (lbs/hr): 12.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 418.0

MAGLC (ug/m3): 84,285.7

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

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Norco

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P016

none

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Norco

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P016

V. Testing Requirements

none

VI. Miscellaneous Requirements

none