



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
TUSCARAWAS COUNTY  
Application No: 06-05171  
Fac ID: 0679000272**

**CERTIFIED MAIL**

**DATE: 8/4/2005**

Progressive Foam Products  
Pat Culpepper  
6753 Chestnut Ridge Road  
Beach City, OH 44608

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 250** 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.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

SEDO

WV

PA

**TUSCARAWAS COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-05171 FOR AN AIR CONTAMINANT SOURCE FOR  
Progressive Foam Products**

On 8/4/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Progressive Foam Products**, located at **6753 Chestnut Ridge Road, Beach City, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-05171:

**Administrative modification to replace synthetic minor operational restriction.**

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.

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 06-05171**

Application Number: 06-05171  
Facility ID: 0679000272  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Progressive Foam Products  
Person to Contact: Pat Culpepper  
Address: 6753 Chestnut Ridge Road  
Beach City, OH 44608

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**6753 Chestnut Ridge Road  
Beach City, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to replace synthetic minor operational restriction.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

Progressive Foam Products

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**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

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **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

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permittee shall comply with the requirement to register such a plan.

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

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permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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**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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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.

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- 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 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**

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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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**13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

**1. Compliance Requirements**

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

**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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**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

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of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

**5. Construction of New Sources(s)**

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

**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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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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., postmarked), 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	239.0

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Expandable Polystyrene (EPS) Foam Line Consisting of a pre-expander, aging bags, block mold, shape molds, extruder and cutting equipment	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) shall not exceed 170.0 pounds per hour or 239.0 tons per year, as a rolling 12-month total.

**2. Additional Terms and Conditions**

- 2.a The permittee shall install and operate capture and control equipment within one year after any 12-month summation of VOC emissions exceeds 200 tons. Such capture and control equipment shall be selected in accordance with the best current technology at that time and shall be approved by the Ohio EPA. Within 45 days after the VOC emissions exceed 200 tons, the permittee shall submit a report to the Ohio EPA, Southeast District Office that describes the proposed capture and control equipment.

**II. Operational Restrictions**

1. Raw material (EPS bead) usage shall not exceed 9,768,000 pounds of EPS bead per year, calculated as a 12-month rolling summation for this emissions unit. Of this amount, EPS bead usage in the extruding and shape molding operations shall not exceed 4,020,840 pounds of EPS bead per year, calculated as a 12-month rolling summation.
2. The pentane and styrene contents of the EPS bead used in this emissions unit shall not exceed 7.0 and 0.1 percent by weight, respectively.

**III. Monitoring and/or Recordkeeping Requirements**

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PTI A

**Issue**

Emissions Unit ID: P002

1. The permittee shall maintain monthly records of the following:
  - a. total pounds of EPS beads processed by the pre-expander;
  - b. total pounds of EPS beads processed in the extruding and shape molding operations;
  - c. total pounds of EPS beads processed into each category of product or shape which has been tested for residual pentane;
  - d. the maximum pentane and styrene contents of EPS beads processed by the pre-expander;
  - e. total pounds of EPS processed by the pre-expander for the rolling, 12-month period;
  - f. total pounds of EPS processed in the extruding and shape molding operations for the rolling, 12-month period;
  - f. total VOC emissions, in tons, for all categories of products and shapes processed, calculated in accordance with the equation in section A.V.1.b; and
  - g. total VOC emissions, in tons, for the rolling, 12-month period.

**IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Southeast District Office in writing of any monthly record showing raw material usage in excess of 9,768,000 pounds of EPS bead per year, calculated as a 12-month rolling summation for this emissions unit or raw material usage in the extruding and shape molding operations in excess of 4,020,840 pounds of EPS bead per year, calculated as a 12-month rolling summation. The notification shall include a copy of such record and shall be sent within 30 days after the exceedance occurs.
2. The permittee shall notify the Ohio EPA, Southeast District Office in writing of any monthly record showing actual VOC emissions in excess of the rolling, 12-month emission limit. The notification shall include a copy of such record and shall be sent within 30 days after the exceedance occurs.
3. The permittee shall submit a summary of the following records to the Ohio EPA, Southeast District Office within thirty (30) days following the end of each calendar quarter:
  - a. the monthly total pounds of EPS beads each processed by the pre-expander and processed in the extruding and shape molding operations;

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Emissions Unit ID: P002

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- b. the total pounds of EPS beads each processed by the pre-expander and processed in the extruding and shape molding operations for the 12-month period ending with each month in the quarter;
- c. the maximum pentane and styrene contents of EPS beads processed by the pre-expander for each month in the quarter;
- d. the monthly total pounds of EPS beads processed into each category of product or shape which has been tested for residual pentane; and
- e. the total VOC emissions for the 12-month period ending with each month in the quarter.

**V. Testing Requirements**

1. Compliance with the emission limitations established in section A.I.1 of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 170.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly raw material usage times the maximum VOC content of raw material used, as a weight fraction (7.0% pentane + 0.1% styrene), as certified by the manufacturer, times the maximum tested percentage of pentane emitted (100 - residual pentane content). This calculation shall be adjusted for differences in pentane emissions between products. So long as this calculation of potential emissions demonstrates that the hourly emission limit can not be exceeded, no additional record keeping and reporting requirements are necessary to demonstrate compliance with this limitation.

According to the most recent results of testing of residual pentane in the final product, a maximum of 63.7% of the pentane in the raw material is released during expanding, storage, block molding and processing, and 76.4% of the pentane in the raw material is released during expanding, storage, extruding or shape molding and processing. Since the process is not differentiated until the extruding/molding stage, the basic calculation can be modified by the addition of

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the maximum product processed thru the extruding and shape molding operations multiplied by the additional emissions associated with those processes, i.e.  $76.4\% - 63.7\% = 12.7\%$ . The initial calculation is shown below.

$(3547 \text{ lb EPS/hr total})(0.071)(0.637) + (459 \text{ lb/hr which is the maximum product processed from extruding/shape molds})(0.071)(0.127) = 164.6 \text{ lbs/hr}$ .

b. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 239.0 tons per year, as a rolling, 12-month summation.

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## Applicable Compliance Method:

Compliance shall be determined by the summation of 12 consecutive monthly emission rates. Monthly emissions shall be determined using the following equation for all products or shapes for which a separate emission factor was developed.

Summation of [(monthly raw material usage, in tons) x (raw material VOC content, as documented by the manufacturer, as a weight fraction) x (1.00 - (the average residual pentane content, as determined by the most recent accepted test results, as a weight fraction)) x (1/2000)] for all products and shapes = VOC emissions, in tons.

2. The permittee shall conduct, or have conducted, testing for residual pentane for all products and shapes in accordance with the following requirements:
  - a. The emission testing shall be conducted once each calendar year, but at least 6 months apart.
  - b. The emission testing shall be conducted using accepted industry test methods.
  - c. Individual emission factors shall be developed for each of the different products or shapes.
  - d. Sampling shall be representative of worst case conditions in terms of sample location, storage time, raw material pentane content, and density for each shape of sampled material. The representative storage time shall be based on the average storage time for each shape of sampled material.
  - e. A minimum of three samples shall be collected from each block or shape. At least three separate blocks or shapes shall be sampled to determine an emission factor.
  - f. An average residual pentane emission factor shall be developed from the sample results by common statistical methods. The individual sample with the lowest residual pentane content shall be noted for the calculation in section A.V.1.a.
  - g. The proposed testing procedure, sampling protocol and sampling date shall be communicated to Ohio EPA, Southeast District Office at least two weeks prior to the sampling date.
  - h. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s) and acquire data and information necessary to ensure that the operation of the emissions unit and the sampling procedures provide a valid characterization of the emissions from the emissions unit.

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- i. The results of the testing shall be submitted to the Ohio EPA, Southeast District Office within 45 days after the testing is completed.

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**VI. Miscellaneous Requirements**

Emissions Unit ID: P002

None.

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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>
P002 - Expanded polystyrene foam line including a pre-expander, aging bags, block mold, shape molds, extruder and cutting equipment	None	None

**2. Additional Terms and Conditions**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

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**Progr**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: P002

None.