☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **05-12749**

A. Source Description

Johnson Controls, Inc. (JCI) manufactures automobile seat cushions. Two polyurethane mold lines are employed to produce the seat cushion products: polyurethane mold line 1, emissions unit P007; and polyurethane mold line 2, emissions unit P005.

Based on potential facility-wide VOC emissions, JCI is a major stationary source, i.e., exceeding 250 tons of VOC emissions. However, JCI received federally enforceable terms and conditions, issued on 12/20/95, to limit VOC emissions from emissions units P005 and P007. As a result, JCI's potential facility-wide VOC emissions are below 250 tons.

JCI has now requested to modify emissions units P005 and P007 to allow for production increases. In addition, JCI has again requested federally enforceable terms and conditions to limit VOC emissions from emissions units P005 and P007.

B. Facility Emissions and Attainment Status

JCI is located at 1147 N. Washington Street, Greenfield, Highland County. At this time, Highland County is designated attainment for the ozone air quality standard.

JCI's facility-wide uncontrolled potential VOC emissions are 269 tons per year. This synthetic minor permit to install will limit VOC emissions from emissions unit P005 to 32.7 tons and from emissions unit P007 to 43.97. As a result, the facility-wide VOC emission are 88.32 tons per year.

C. Source Emissions

JCI uses mold release agents to prevent the foam product from sticking to the mold. The mold release agents contain organic solvents. There are two mold release agents employed: the spray mold release agent; and the paste mold release agent. Emissions from the spray mold release agent are captured and destroyed by a regenerative thermal oxidizer (RTO). Emissions from the paste mold release agent are emitted directly to the atmosphere.

Material usage limitations for both the spray mold release agent and the paste mold release agent as well as capture and control by the RTO shall ensure that emissions from this project will not exceed 76.67 tons per rolling, 365-day summation. To ensure compliance with the rolling, 365-day VOC emission limitation for each emissions unit, the permittee is required to maintain daily records of material usage, continuously monitor the combustion temperature of the RTO, and perform periodic testing to determine capture efficiency and to determine the RTO destruction efficiency.

D. Conclusion

This Synthetic Minor PTI will effectively restrict the potential VOC emissions from emissions units P005 and P007. As a result, the modification to increase production for the polyurethane mold lines 2 and 1, emissions units P005 and P007, will not result in a significant emissions increase. In addition, the facility-wide potential VOC emissions will be well below the major source threshold of 250 tons.

A combination of material usage limitations, rolling, 365-day record keeping, continuous temperature monitor for the RTO, and quarterly deviation reporting requirements shall ensure that compliance with the emissions limitation is maintained.

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
HIGHLAND COUNTY
Application No: 05-12749

DATE: 1/22/2004

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Johnson Controls, Inc.
Patricia Gray
1147 N. Washington Street
Greenfield, OH 451239782

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 of 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

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

CC: USEPA SWDO KY IN

HIGHLAND COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **05-12749** FOR AN AIR CONTAMINANT SOURCE FOR
JOHNSON CONTROLS, INC.

On 1/22/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Johnson Controls, Inc.**, located at **1147 N. Washington Street, Greenfield**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-12749:

Modification to polyurethane foam mold lines 1 and 2.

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]

DRAFT PERMIT TO INSTALL 05-12749

Application Number: 05-12749

APS Premise Number: 0536010034

Permit Fee: **To be entered upon final issuance**

Name of Facility: Johnson Controls, Inc.

Person to Contact: Patricia Gray

Address: 1147 N. Washington Street
Greenfield, OH 451239782

Location of proposed air contaminant source(s) [emissions unit(s)]:
1147 N. Washington Street
Greenfield, Ohio

Description of proposed emissions unit(s):
Modification to polyurethane foam mold lines 1 and 2.

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 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.

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

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 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 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

Pollutant	Tons Per Year
VOC	76.67

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	Applicable Emissions Limitations/Control Measures
P005 - Polyurethane foam molding line 2 Terms in this permit supersede those identified in PTI 05-6470 issued on 12/20/95.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 12.1 pounds per hour (see Section A.I.2.a). Particulate emissions (PE) shall not exceed 0.5 pounds per hour (see Section A.I.2.a) or 1.3 tons per year. Visible PE from the stack shall not exceed 0% opacity. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	See Section A.II.1.
	OAC rules 3745-17-07(A) and 3745-17-11(B)	See Section A.I.2.c.
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 32.7 tons as a rolling, 365-day summation. See Section A.II.2 and A.II. 3.

2. Additional Terms and Conditions

2.a The 12.1 lbs VOC per hour and the 0.5 lbs PE per hour limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.

2.b The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.c The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Highland County.

This emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

3. The maximum annual spray mold release agent usage for this emissions unit shall not exceed 118.6 tons, based upon a rolling, 365-day summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

4. The maximum annual paste mold release agent usage for this emissions unit shall not exceed 10.7 tons, based upon a rolling, 365-day summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the company name and identification for each liquid organic material employed; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

   The permittee shall collect and record the following information for each day:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

3. The permittee shall maintain daily records of the following information for this emissions unit:

   a. the company name and identification for the spray mold release agent employed;

   b. the VOC content of the spray mold release agent employed, in % by weight;

   c. the spray mold release agent usage for each day, in pounds;

   d. the rolling, 365-day summation of spray mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);

   e. the company name and identification for the paste mold release agent employed;

   f. the VOC content of the paste mold release agent employed, in % by weight;

   g. the paste mold release agent usage for each day, in pounds;

   h. the rolling, 365-day summation of paste mold release agent usage, in pounds or tons;

4. The permittee shall calculate and maintain daily records of the following:

   a. the daily VOC emissions from spray mold release, i.e., calculated as follows:

Es = (Us)(VOCs)[1 - (CE)(DE)]

where,

Es = daily VOC emission rate from spray mold release agent, in pounds
Us = daily spray mold release agent usage, in pounds (A.III.3.c.)
VOCs = VOC content of spray mold release agent, % by weight (A.III.3.b.)
CE = capture efficiency, as determined during the most recent compliance demonstration
DE = destruction efficiency, as determined during the most recent compliance demonstration

b. the daily VOC emissions from the paste mold release, i.e., calculated as follows:

Ep = (Up)(VOCp)

where,

Ep = daily VOC emission rate from paste mold release agent, in pounds
Up = daily paste mold release agent usage, in pounds (A.III.3.g.)
VOCp = VOC content of paste mold release agent,% by weight (A.III.3.f.)

c. the total daily VOC emission rate, i.e., Es + Ep; and

d. the rolling, 365-day summation of VOC emissions, in tons.

5. The permittee shall maintain records that document any time periods when the panel filters serving as PE controls for this emissions unit were not in service while this emissions unit was operating.

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.2. above.

b. All exceedance of the rolling, 365-day spray mold release agent usage of 118.6 tons.

c. All exceedance of the rolling, 365-day paste mold release agent usage of 10.7 tons.

d. All exceedance of the rolling, 365-day VOC emission limitation of 32.70 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the panel filters serving as PE controls for this emissions unit were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

V. Testing Requirements

Compliance with the emission limitations in Section A..I.1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:
12.1 pounds VOC per hour

Applicable Compliance Method:
Compliance with the hourly VOC emission limitation may be determined as follows:

Evoc = (Uspray)(VOCs)[1 - (CE)(DE)] + (Upaste)(VOCp)

where,

Evoc = maximum hourly VOC emissions rate
Uspray = maximum hourly spray release agent usage rate (41.7 lbs)
VOCs = VOC content of spray mold release agent (maximum of 95% or 0.95)
CE = VOC capture efficiency from the spray mold release agents, as determined during the most recent compliance test
DE = VOC destruction efficiency, as determined during the most recent compliance test
Upaste = maximum hourly paste release agent usage rate (4.4 lbs)
VOCp = VOC content of paste mold release agent (maximum of 95% or 0.95)

2. Emission Limitation:
32.7 tons VOC as a rolling, 365-day summation

Applicable Compliance Method:
Compliance with the rolling, 365-day VOC emissions limitation shall be determined through the record keeping requirements established in Part III - Section A.III.4. of this permit.

3. Emission Limitation:

0.5 pounds PE per hour
1.3 tons PE per year

Applicable Compliance Method:
Compliance with the hourly PE limitation shall be determined as follows:

Epe = (Uspray)(S)[1 - (CE)(RE)]

Epe = maximum hourly PE rate
Uspray = maximum hourly spray release agent usage rate (41.7 lbs)
S = solid content of spray mold release agent (maximum of 5% or 0.05)
CE = capture efficiency (100% for solids)
RE = removal efficiency (78% for panel filters)

Compliance with the annual PE limitations shall be determined by the above equation except the maximum hourly spray is substituted for the maximum annual spray of 118.6 tons.

4. Visible Emission Limitation:
0% opacity from the stack

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

5. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

6. 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 3.0 years after permit issuance, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

   b. The emission testing shall be conducted to demonstrate compliance with the following: the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

   c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

      i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

      ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 OAC rule 3745-21-10 or an approved alternative test protocol. 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.

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.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Polyurethane foam molding line 2 Terms in this permit supersede those identified in PTI 05-6470 issued on 12/20/95.		

2. Additional Terms and Conditions

II. Operational Restrictions

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P005 and P007 were evaluated based on the actual materials and the design parameters of the emissions units' 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 these emissions units 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 (CAS):	TLV (ug/m3):	Maximum Hourly Emission rate (pounds/hr):	Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	MAGLC (ug/m3):
Naptha (64742-47-8)	200,000	12.1	2,056	4,761
Diethanol-amine (111-42-2)	2,000	0.0001319	0.0105	47.6
2,4-TDI (584-84-9)	35.6	0.00583	0.463	0.848

2. 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.

3. 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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P007 - Polyurethane foam molding line1 Terms in this permit supersede those identified in PTI 05-6470 issued on 12/20/95.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 16.1 pounds per hour (see Section A.I.2.a). Particulate emissions (PE) shall not exceed 0.5 pounds per hour (see Section A.I.2.a) or 1.3 tons. Visible PE from the stack shall not exceed 0% opacity. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	See Section A.II.1.
	OAC rules 3745-17-07(A) and 3745-17-11(B)	See Section A.I.2.c.
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 32.7 tons as a rolling, 365-day summation. See Section A.II.2 and A.II. 3.

2. Additional Terms and Conditions

2.a The 16.1 lbs VOC per hour and the 0.5 lbs PE per hour limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.

2.b The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.c The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Highland County.

This emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

3. The maximum annual spray mold release agent usage for this emissions unit shall not exceed 118.6 tons, based upon a rolling, 365-day summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

4. The maximum annual paste mold release agent usage for this emissions unit shall not exceed 10.7 tons, based upon a rolling, 365-day summation of the spray mold release usage figures. (The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.)

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the company name and identification for each liquid organic material employed; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

   The permittee shall collect and record the following information for each day:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

3. The permittee shall maintain daily records of the following information for this emissions unit:

   a. the company name and identification for the spray mold release agent employed;

   b. the VOC content of the spray mold release agent employed, in % by weight;

   c. the spray mold release agent usage for each day, in pounds;

   d. the rolling, 365-day summation of spray mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);

   e. the company name and identification for the paste mold release agent employed;

   f. the VOC content of the paste mold release agent employed, in % by weight;

   g. the paste mold release agent usage for each day, in pounds;

   h. the rolling, 365-day summation of paste mold release agent usage, in pounds or tons;

4. The permittee shall calculate and maintain daily records of the following:

   a. the daily VOC emissions from spray mold release, i.e., calculated as follows:

Es = (Us)(VOCs)[1 - (CE)(DE)]

where,

Es = daily VOC emission rate from spray mold release agent, in pounds
Us = daily spray mold release agent usage, in pounds (A.III.3.c.)
VOCs = VOC content of spray mold release agent, % by weight (A.III.3.b.)
CE = capture efficiency, as determined during the most recent compliance demonstration
DE = destruction efficiency, as determined during the most recent compliance demonstration

b. the daily VOC emissions from the paste mold release, i.e., calculated as follows:

Ep = (Up)(VOCp)

where,

Ep = daily VOC emission rate from paste mold release agent, in pounds
Up = daily paste mold release agent usage, in pounds (A.III.3.g.)
VOCp = VOC content of paste mold release agent,% by weight (A.III.3.f.)

c. the total daily VOC emission rate, i.e., Es + Ep; and

d. the rolling, 365-day summation of VOC emissions, in tons.

5. The permittee shall maintain records that document any time periods when the panel filters serving as PE controls for this emissions unit were not in service while this emissions unit was operating.

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.2. above.

b. All exceedance of the rolling, 365-day spray mold release agent usage of 118.6 tons.

c. All exceedance of the rolling, 365-day paste mold release agent usage of 10.7 tons.

d. All exceedance of the rolling, 365-day VOC emission limitation of 43.97 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the panel filters serving as PE controls for this emissions unit were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

V. Testing Requirements

Compliance with the emission limitations in Section A..I.1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:
16.1 pounds VOC per hour

Applicable Compliance Method:
Compliance with the hourly VOC emission limitation may be determined as follows:

Evoc = (Uspray)(VOCs)[1 - (CE)(DE)] + (Upaste)(VOCp)

where,

Evoc = maximum hourly VOC emissions rate
Uspray = maximum hourly spray release agent usage rate (41.7 lbs)
VOCs = VOC content of spray mold release agent (maximum of 95% or 0.95)
CE = VOC capture efficiency from the spray mold release agents, as determined during the most recent compliance test
DE = VOC destruction efficiency, as determined during the most recent compliance test
Upaste = maximum hourly paste release agent usage rate (4.4 lbs)
VOCp = VOC content of paste mold release agent (maximum of 95% or 0.95)

2. Emission Limitation:
43.97 tons VOC as a rolling, 365-day summation

Applicable Compliance Method:
Compliance with the rolling, 365-day VOC emissions limitation shall be determined through the record keeping requirements established in Part III - Section A.III.4. of this permit.

3. Emission Limitation:

0.5 pounds PE per hour
1.3 tons PE per year

Applicable Compliance Method:
Compliance with the hourly PE limitation shall be determined as follows:

Epe = (Uspray)(S)[1 - (CE)(RE)]

Epe = maximum hourly PE rate
Uspray = maximum hourly spray release agent usage rate (41.7 lbs)
S = solid content of spray mold release agent (maximum of 5% or 0.05)
CE = capture efficiency (100% for solids)
RE = removal efficiency (78% for panel filters)

Compliance with the annual PE limitations shall be determined by the above equation except the maximum hourly spray is substituted for the maximum annual spray of 118.6 tons.

4. Visible Emission Limitation:
0% opacity from the stack

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

5. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

6. 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 3.0 years after permit issuance, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

   b. The emission testing shall be conducted to demonstrate compliance with the following: the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

   c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

      i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

      ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

      iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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 OAC rule 3745-21-10 or an approved alternative test protocol. 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.

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.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office 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 Ohio EPA, Southwest District Office.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P007 - Polyurethane foam molding line1 Terms in this permit supersede those identified in PTI 05-6470 issued on 12/20/95.		

2. Additional Terms and Conditions

2.a

II. Operational Restrictions

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P005 and P007 were evaluated based on the actual materials and the design parameters of the emissions units' 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 these emissions units 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 (CAS):	TLV (ug/m3):	Maximum Hourly Emission rate (pounds/hr):	Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	MAGLC (ug/m3):
Naptha (64742-47-8)	200,000	12.1	2,056	4,761
Diethanol-amine (111-42-2)	2,000	0.0001319	0.0105	47.6
2,4-TDI (584-84-9)	35.6	0.00583	0.463	0.848

2. 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.

3. 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

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none