

Facility ID: 0679000272 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001: 100 HP Boiler
Z002: Gateway Cutting Line
Z003: Graco Adhesive Melter

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0679000272 Emissions Unit ID: P002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
EPS Foam Line Consisting of Expander, Mold, and Curing Bags	OAC 3745-31-05 PTI # 06-5171	Emissions of organic compounds (pentane) shall not exceed 170.0 pounds per hour or 249.1 tons per year, as a rolling 12-month summation.

2. Additional Terms and Conditions

- a. Progressive Foam Products shall install and operate capture and control equipment within one year after the total 12-month VOC emissions exceed 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.

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II. Operational Restrictions

1. Raw material usage shall not exceed 96,000 pounds per day for the expander and storage bags combined, and 63,000 pounds per day for molding and processing combined.

According to research by USEPA, 43% of the pentane emissions is released during expanding and storage, 42% is released in molding and processing, and 15% remains in the product. It is not possible to exceed the hourly emission limit when raw material usage is less than the above values, as the following calculation shows: (96,000/24 lb EPS)(6% pentane)(43% released) + (63,000/24 lb EPS)(6% pentane)(42% released) = 169.35 lb/hr.

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III. Monitoring and/or Record Keeping Requirements

1. Progressive Foam Products shall maintain daily records of the following:
 - a. Total pounds of EPS beads employed in the expander.
 - b. Total pounds of EPS beads employed in molding and processing.
2. Progressive Foam Products shall maintain monthly records of the following:
 - a. Total pounds of EPS beads employed in the expander.
 - b. Total pounds of EPS beads employed in molding and processing.
 - c. Total OC emissions, in tons, as a rolling 12-month total calculated in accordance with Section A.V.2.

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IV. Reporting Requirements

1. Progressive Foam Products shall notify the Director, in accordance with Part I, Section A.1 of this permit, of any daily record showing raw material usage in excess of 96,000 pounds per day in the expander or 63,000

pounds per day in the molds.

2. Progressive Foam Products shall notify the Director, in accordance with Part I, Section A.1 of this permit, of any monthly record showing actual OC emissions in excess of the rolling 12-month emission limit.
3. The permittee shall submit quarterly summaries of the following records, in accordance with Part I, Section A.1 of this permit:
 - a. the maximum daily raw material usages for the expander and for the molding and processing; and
 - b. the total OC emissions for the 12-month period ending with each month in the quarter.
4. If Progressive Foam Products obtains new information which would result in an increase or a decrease in the emission factor values listed in Section A.V.1, documentation which details the revised emission factor shall be submitted within 30 days after this information becomes available.

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V. **Testing Requirements**

1. The emission factors for each part of the EPS line were derived from "Control of VOC Emissions from Polystyrene Foam Manufacturing" (USEPA document # EPA450/3-90-020) and MSDS information:
 - a. pentane content of EPS beads: 6% VOC, by weight;
 - b. loss during expansion: 24% of original pentane content, by weight;
 - c. loss during storage (24 hrs.): 19% of original pentane content, by weight;
 - d. loss during molding: 14% of original pentane content, by weight;
 - e. loss during processing (48 hrs.): 28% of original pentane content, by weight; and
 - f. retention in product: 15% of original pentane content, by weight.
2. Calculation of OC emissions from P002, as a rolling 12-month summation:
 - a. Multiply the monthly raw material usage recorded pursuant to Section A.III.2.a by the emission factor listed in Section A.V.1.a and by the sum of the emission factors listed in Section A.V.1.b through A.V.1.e to determine the OC emissions for the month.
 - b. Sum the values obtained in a. for each 12-month period to determine the rolling 12-month summation.

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VI. **Miscellaneous Requirements**

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None