Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/20/2011

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Randall Brown
Bridgestone APM Company - Foam Products Division
245 Commerce Way
Upper Sandusky, OH 43351

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0388010051
Permit Number: P0108669
Permit Type: OAC Chapter 3745-31 Modification
County: Wyandot

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada

Response to Comments

Facility ID:	0388010051
Facility Name:	Bridgestone APM Company - Foam Products Division
Facility Description:	polyurethane foam automotive seat cushion manufacturer
Facility Address:	245 Commerce Way Upper Sandusky, OH 43351 Wyandot County
Permit:	P0108669, Permit-To-Install - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Daily Cheif-Union on 11/18/2011. The comment period ended on 12/18/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None received.

b. Response: None.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Bridgestone APM Company - Foam Products Division

Facility ID:	0388010051
Permit Number:	P0108669
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/20/2011
Effective:	12/20/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Bridgestone APM Company - Foam Products Division

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Authorization

Facility ID: 0388010051
Facility Description: Polyurethane foam automotive seat cushion manufacturer
Application Number(s): A0042595
Permit Number: P0108669
Permit Description: Chapter 31 modification for seat lines #1 and #2 to: 1) remove electrostatic spray as a BAT requirement for both lines and also increase their short term (gal/hr) mold release usage rates. Seat line #1 is also having a "service -mode" production restriction removed that will allow it to now be operated at a full production rate. 2) Revise the facility's synthetic minor strategy for maintaining facility VOC emissions below "Major Facility" status for PSD (<250 TPY) by obtaining a group limit for emission units P005, P006, P007, P008, P801, R001,and R002. Note: emission units P007, P008, P801, R001 and R002 are not being modified per se, and are included for synthetic minor purposes only. Modification of PTI #'s P0104512, P0104928, 03-16345, and 03-17452.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $400.00
Issue Date: 12/20/2011
Effective Date: 12/20/2011

This document constitutes issuance to:

Bridgestone APM Company - Foam Products Division
245 Commerce Way
Upper Sandusky, OH 43351

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108669
Permit Description: Chapter 31 modification for seat lines #1 and #2 to: 1) remove electrostatic spray as a BAT requirement for both lines and also increase their short term (gal/hr) mold release usage rates. Seat line #1 is also having a "service -mode" production restriction removed that will allow it to now be operated at a full production rate. 2) Revise the facility's synthetic minor strategy for maintaining facility VOC emissions below "Major Facility" status for PSD (<250 TPY) by obtaining a group limit for emission units P005, P006, P007, P008, P801, R001,and R002. Note: emission units P007, P008, P801, R001 and R002 are not being modified per se, and are included for synthetic minor purposes only. Modification of PTI #'s P0104512, P0104928, 03-16345, and 03-17452.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P801**
Company Equipment ID:	P801
Superseded Permit Number:	P0104512
General Permit Category and Type:	Not Applicable

Group Name: Group A

Emissions Unit ID:	**P005**
Company Equipment ID:	Line #2
Superseded Permit Number:	P0104512
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Line #1
Superseded Permit Number:	P0104928
General Permit Category and Type:	Not Applicable

Group Name: Group B

Emissions Unit ID:	**P007**
Company Equipment ID:	Line #2: EA Pad
Superseded Permit Number:	03-16345
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	Line #3: EA Pad
Superseded Permit Number:	03-16345
General Permit Category and Type:	Not Applicable

Group Name: Group C

Emissions Unit ID:	**R001**
Company Equipment ID:	Glue Booth #1
Superseded Permit Number:	03-17452
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Glue Booth #2
Superseded Permit Number:	03-17452
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions,

andcontroldeviceoperatingparameterlimitations, 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 Ohio EPA DAPC, Northwest District Office. The written 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 A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

5. 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 Ohio EPA DAPC, Northwest District Office 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).

6. Compliance Requirements

a) 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.

b) 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.

c) 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:

(1) 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.

(2) 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.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Ohio EPA DAPC, Northwest District Office.

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 Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permitteeshall

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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

a) 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.

b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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.

16. 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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart III, National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Production: P005 and P006. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA, Northwest District Office.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Group A: P005(Seat Line #2), and P006 (Seat Line #1)

Operations, Property and/or Equipment Description:

Polyurethane foam seat line nos.2 and 1

a) 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) b)(1)d., d)(4) through d)(7)., and e)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The requirements of this rule are equivalent to compliance with the requirements 40 CFR Part 63, Subpart III.
b.	OAC rule 3745-31-05(D)	240 tons VOC per rolling, 12-month period from emissions units P005, P006, P007, P008, P801, R001, and R002, combined. See b)(2)a. and c)(1).
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
d.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(4) through d)(7).
e.	40 CFR Part 63, Subpart III (See 40 CFR Part 63.1290 et seq.) [In accordance with 40 CFR 63.1290, this emissions unit is a flexible polyurethane foam process at an existing flexible polyurethane foam production facility.]	Formulation prohibitions, work practice standards for hazardous air pollutants (HAPS) [See c)(5).]
f.	40 CFR 63.1-15 (40 CFR 63.1302)	Table 2 to Subpart III of 40 CFR Part 63-Applicability to Subpart III shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002 shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002 shall not exceed 240 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum allowable cumulative emissions of VOC (tons)
1	20
1-2	40
1-3	60
1-4	80
1-5	100
1-6	120
1-7	140
1-8	160
1-9	180
1-10	200
1-11	220
1-12	240

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

(4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart III, including the following sections:

63.1300(a)- HAP or HAP-based material shall not be used as equipment cleaner to flush mixhead, with exception of diisocyanates during periods of startup or maintenance, provided they are contained in closed-loop system and re-used in production.

63.1300(b)- HAP-based mold release agent is prohibited.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. The company identification for each mold release material employed;

b. The number of gallons of each mold release material employed;

c. The VOC content, in lbs/gallon, for each mold release material, as applied;

d. The VOC emission rate for each mold release material employed, in lbs/month [d)(1)b. x d)(1)c. for each mold release material employed]; and

e. The total monthly VOC emission rate for all mold release material employed, (summation of d)(1)d. for all materials, divided by 2000), in tons.

(2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emissions units P005, P006, P007, P008, P801, R001, and R002, combined:

a. for the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC emissions, in tons per month; and

b. beginning after the first 12 calendarmonths of operation following the issuance of this permit, the rolling, 12-month summation of the monthly VOC emissions, in tons.

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart III, including the following sections:

63.1308(e)(1) – documentation of each calendar day that a HAP-based material is used as an equipment cleaner (except for diisocyanates during periods of startup or maintenance, provided they are contained in closed-loop system and re-used in production).

63.1308(e)(2) – documentation of each calendar day when a HAP-based material is used as a mold release agent.

(4) The permit-to-install application for emissions unitsP005and P006 wasevaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air

dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour work day and a 40-hour work week, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists"(ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the "American Conference of Governmental Industrial Hygienists"(ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24"hours per day and "7"days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   $$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case"toxic contaminant(s):

   Toxic Contaminant: toluene diisocyanate

   TLV (mg/m3): 0.036

   Maximum Hourly Emission Rate (lbs/hr): 0.00549, for P005 and P006, individually*

   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 0.1242 for P005 and P006, individually;

   MAGLC (ug/m3): 0.857

The permittee, has demonstrated that emissions of toluene diisocyanate, from emissions units P005 and P006, combined,is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted “1-hour maximum ground level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute”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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(8) The permittee shall maintain documentation of its established procedures for the dry filtration system.Any modifications deemed necessary by the permittee shall also be documented. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(9) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

(10) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

(11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(12) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions units were in operation or not operated in accordance with its established procedures. These records shall be

maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect; and

c. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall submit annual compliance certifications and other such notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart III, per the following sections:

63.1306(g)- annual compliance report.

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

240 tons VOC per rolling, 12-month period from emissions units P005, P006, P007, P008, P801, R001, and R002, combined

<u>Applicable Compliance Method:</u>
Compliance shall be based upon the record keeping specified in terms d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Group B: P007(EA Pad Line #2), and P008 (EA Pad Line #3)

Operations, Property and/or Equipment Description:

EA pad line nos.2 and 3 - mold release operations

a) 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) d)(4) and d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (for emissions unit P007 only)	5.97 lbs organic compounds (OC)/hour 0.04 lb particulate emissions (PE)/hour, 0.18 ton PE/year See b)(2)e.
b.	OAC rule 3745-31-05(A)(3) (for emissions unit P008 only)	7.63 lbs OC/hour 0.05 lb PE/hour, 0.22 ton PE/year See b)(2)e.
c.	OAC rule 3745-31-05(A)(3) (for all emissions units in this emissions unit group)	Visible PE shall not exceed 0% opacity as a six-minute average. See b)(2)a. and b)(2)b.
d.	OAC rule 3745-31-05(D)	240 tons of VOC per rolling 12-month period, from emissions units P005, P006, P007, P008, P801, R001, and R002, combined See b)(2)c. and c)(1).
e.	OAC rule 3745-17-11(C) (for all emissions units in this emissions unit group)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of panel filters for PE control.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

c. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

d. On December 27, 2010, OAC rule 3745-17-11(C) became an effective requirement under the Ohio State Implementation Plan regulating particulate emissions from surface coating operations. In accordance with OAC rule 3745-17-11(C)(3) the permittee shall comply with the PE limitations established as best available technology requirements in PTI #03-16345, issued May 7, 2009.

e. All organic compounds are volatile organic compounds.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per year, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum allowable cumulative emissions of VOC (tons)
1	20
1-2	40
1-3	60
1-4	80
1-5	100
1-6	120
1-7	140
1-8	160
1-9	180
1-10	200
1-11	220
1-12	240

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

(2) The permittee shall operate the panel filters whenever P007 and P008 are in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the panel filters were not in service when the emissions units were in operation.

(2) The permittee shall maintain monthly records of the following information for each emissions unit:

a. the company name and identification of each mold release agent applied;

b. the number of gallons of each mold release agent employed;

c. the VOC content, pounds per gallon, for each mold release agent, as applied;

d. the VOC emission rate for each mold release agent employed, in lbs/month [d)(2)b. x d)(2)c. for each mold release agent employed]; and

e. the total monthly VOC emission rate for all mold release agents employed, in lbs [sum of d)(2)d. for all mold release agents].

(3) In conjunction with the record keeping requirements specified in d)(2) above, the permittee shall also record the following each month for emissions units P005, P006, P007, P008, P801, R001, and R002, combined:

a. for the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC emissions, in tons per month; and

b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly VOC emissions, in tons.

(4) The application for permit to install (PTI) #03-16345 (issued 05-07-09) for emission units P007 and P008 was evaluated based on the actual materials (mold release agent) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission 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: aliphatic naphtha
TLV (mg/m^3): 572.6
Maximum Hourly Emission Rate (lbs/hr): 13.60
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 280.7
MAGLC (ug/m^3): 13,633

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 (mold release agent), 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 compositions 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.

(5) The permittee shall collect, record, and retain the following information when it conducts evaluation 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.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the panel filters were not in service when emissions units P007 and P008 were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

5.97 lbs OC/hr (for emissions unit P007)

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with the OC limitation above in accordance with the methods as outlined in 40 CFR Part 60, Appendix A, Methods 1 – 4 and 18, 25, or 25A, as appropriate.

*The potential to emit is based on a maximum gallon usage of 1.08 gal/hr and a maximum VOC content of 5.53 lbs/gal.

b. Emission Limitation:

0.04 lb PE/hour (for emissions unit P007)

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

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

Where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

c. Emission Limitation:

0.18 ton of PE/year for (emissions unit P007)

Applicable Compliance Method:
The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

d. Emission Limitation:

7.63 lbs OC/hr (for emissions unit P008)

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

If required, the permittee shall demonstrate compliance with the OC limitation above in accordance with the methods as outlined in 40 CFR Part 60, Appendix A, Methods 1 – 4 and 18, 25, or 25A, as appropriate.

*The potential to emit is based on a maximum gallon usage of 1.38 gal/hr and a maximum VOC content of 5.53 lbs/gal.

e. Emission Limitation:

0.05 lb PE/hour (for emissions unit P008)

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

E = (maximum coating solids usage rate in lbs/hr) x (1 - TE)(1 - CE)

Where

E = PE rate (lbs/hr)

TE = transfer efficiency (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used)

CE = control efficiency of the control equipment

If required, compliance with the hourly PE limitation shall be based on stack testing in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

f. Emission Limitation:

0.22 ton of PE/year for emissions unit P008

Applicable Compliance Method:
The annual limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

240 tons VOC per rolling 12-month period for emissions units P005, P006, P007, P008, P801, R001, and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in terms d)(2) and d)(3) of this permit.

h. Emission Limitation:

Visible PE shall not exceed 0% opacity, as a six-minute average.

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

g) Miscellaneous Requirements

(1) None.

3. P801, Facility-wide paste wax usage

Operations, Property and/or Equipment Description:

Facility-wide paste wax usage

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/31/01	1100 pound VOC per month.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)	240 tons of VOC per rolling, 12-month period, from emissions units P005, P006, P007, P008, P801, R001, and R002, combined See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of volatile organic compounds (VOC) since the uncontrolled potential to emit for VOC are less than 10 tons per year.

The potential to emit for this emissions unit is 6.60 tons VOC/year and were determined as follows:

VOC Emissions: potential emissions were determined by multiplying a worst-case VOC content of 6.67 lbs OC/gallon by a known weight of 6.60 gallons/bucket and a maximum annual usage of 300 buckets/year, divided by a conversion factor of 2000 lbs/ton.

c. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum allowable cumulative emissions of VOC (tons)
1	20
1-2	40
1-3	60
1-4	80
1-5	100
1-6	120
1-7	140
1-8	160
1-9	180
1-10	200
1-11	220
1-12	240

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

d) 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 all paste wax used;

b. The number of gallons of eachpaste waxmaterial employed;

c. The VOC content, pounds per gallon, for each paste wax material, as applied;

d. The VOC emission rate for each paste waxmaterial, in lbs/month [d)(1)b. x d)(1)c. for paste wax employed]; and

e. The total monthly VOC emission rate for all paste wax employed, in lbs [sum of d)(1)d. for all mold release agents].

(2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emissions units P005, P006, P007, P008, P801, R001, and R002, combined:

a. For the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC emissions, in tons per month; and

b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly VOC emissions, in tons.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1100 pounds VOC per month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in term d)(1) of this permit.

b. Emission Limitation:

240 tons VOC per rolling, 12-month period for emissions units P005, P006, P007, P008, P801, R001, and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in terms d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group – Group C: R001(Glue Booth #1), and R002 (Glue Booth #2)

Operations, Property and/or Equipment Description:

Manual glue booth nos.1 and 2

a) 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) b)(1)d., d)(3) through d)(6)., and e)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a) (for emissions unit R001 only)	9.80 lbs organic compounds (OC)/hour See b)(2)a., b)(2)c., b)(2)d. and c)(4).
b.	OAC rule 3745-31-05(A)(3)(a) (for emissions unit R002 only)	9.80 lbs organic compounds (OC)/hour See b)(2)a., b)(2)c., b)(2)d. and c)(4).
c.	OAC rule 3745-31-05(D)	240 tons VOC per rolling 12-month period from emissions units P005, P006, P007, P008, P801, R001, and R002, combined See b)(2)b. and c)(1).
d.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(3) through d)(6).
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

b. The VOC emissions from emissions units P005, P006, P007, P008, P801, R001, and R002, combined, shall not exceed 240 tons per rolling, 12-month period based upon a 12-month summation of the monthly emissions [see c)(1)].

The 240 tons of VOC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

c. The hourly emission limitation of 9.80 lbs OC/hour represents the potential to emit for each emissions unit and was established by multiplying the maximum hourly coating usage rate (1.76 gallons per hour) by the maximum OC coating content (5.57 pounds of OC per gallon). Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

d. All organic compounds are volatile organic compounds.

c) Operational Restrictions

(1) The maximum annual VOC emissions from P005, P006, P007, P008, P801, R001, and R002 shall not exceed 240 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum allowable cumulative emissions of VOC (tons)
1	20
1-2	40
1-3	60
1-4	80
1-5	100
1-6	120
1-7	140
1-8	160
1-9	180
1-10	200
1-11	220
1-12	240

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling 12-month summation of the monthly emissions for emissions units P005, P006, P007, P008, P801, R001, and R002, combined.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.

(4) The OC content of the adhesive employed in emissions unit R001 and R002 shall not exceed 5.57 pounds per gallon, as applied.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. the company name and identification of each adhesive applied;

b. the number of gallons of each adhesive employed;

c. the OC and VOC content, in pounds per gallon, for each adhesive, as applied;

d. the VOC emission rate for each adhesive employed, in lbs/month [d)(1)b. times d)(1)c. for each adhesive employed]; and

e. the total monthly VOC emission rate for all adhesives employed, in lbs [sum of d)(1)d. for all adhesives].

(2) In conjunction with the record keeping requirements specified in d)(1) above, the permittee shall also record the following each month for emission units P005, P006, P007, P008, P801, R001, and R002, combined:

a. for the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly emissions rate of VOC, in tons per month; and

b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.

(3) The application for permit-to-install (PTI) #03-17452 (issued 12-31-08), for emissions units R001 and R002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/24 x 5/7 = 4 TLV/42 = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Hexane

TLV (mg/m3): 176.24

Maximum Hourly Emission Rate (lbs/hr): 29.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1480

MAGLC (ug/m3): 4196

The permittee, has demonstrated that emissions of hexane, from emissions unit(s) R001 and R002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted "1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(7) The permittee shall maintain documentation of its established procedures for the dry filtration system.Any modifications deemed necessary by the permittee shall also be documented. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(8) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.

(9) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.

(10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(11) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions units were in operation or not operated in accordance with its established procedures. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:

a. all exceedances of the rolling, 12-monthemission limitation for VOCs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

b. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation;

c. any exceedances of the maximum allowable adhesive OC content specified in c)(4); and

d. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

The permittee shall submit these deviation (excursion) reports in accordance with the Standard Terms and Conditions of this permit.

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.80 lbs OC/hour for emissions units R001 and R002, individually

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for each emissions unit and was established by multiplying the maximum hourly coating usage rate (1.76 gallons per hour) by the maximum OC coating content (5.57 pounds of OC per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation:

240 tons VOC per rolling, 12-month period for emissions units P005, P006, P007, P008, P801, R001, and R002 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in terms d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.