



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

**RE: FINAL PERMIT TO INSTALL**

**MIAMI COUNTY**

**Application No: 08-04803**

**Fac ID: 0855100531**

**DATE: 1/30/2007**

Polysource, Inc.  
Robert Brinkman  
PO Box 916 555 E. Statler Rd.  
Piqua, OH 453569227

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

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

CC: USEPA

RAPCA



**Permit To Install  
Terms and Conditions**

**Issue Date: 1/30/2007  
Effective Date: 1/30/2007**

**FINAL PERMIT TO INSTALL 08-04803**

Application Number: 08-04803  
Facility ID: 0855100531  
Permit Fee: **\$800**  
Name of Facility: Polysource, Inc.  
Person to Contact: Robert Brinkman  
Address: PO Box 916 555 E. Statler Rd.  
Piqua, OH 453569227

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**555 E Statler Rd  
Piqua, Ohio**

Description of proposed emissions unit(s):  
**2 new molding machines.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Laura Powell  
Acting Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compound	74.9

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P001) - expandable polystyrene (EPS) pre-expander 350 lbs/hr (EX 1000) installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 5.25 lbs/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

2. **Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P015 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.
3. The permit to install for this emissions unit P001 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio

EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be

required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission limitation:  
The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 5.25 lbs/hr.  
  
Applicable Compliance Method:  
The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (350 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).
  - b. Emission limitation:  
The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.  
  
Applicable Compliance Method:  
Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
  - b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
  - c. The emission testing shall be conducted using industry acceptable test methods.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
  - e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of

the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).

- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P002) - Expandable Polystyrene (EPS)**

pre-expander EX 2000 installed pre 08/03/2006

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 10.5 lbs/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P002 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 10.5 lbs/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (700 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P003) - Expandable Polystyrene (EPS) molding machine (HS 1300) installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P003 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P004) - Expandable Polystyrene (EPS) molding machine (HS 1300) installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P004 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013 and P014 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

**Operations, Property, and/or Equipment - (P005) - Expandable Polystyrene (EPS) molding machine HS 1300 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:  
  
$$[\text{pentane loss from each emissions unit (lb pentane/lb EPS resins)} \times \text{the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month)} = \text{tons OC (pentane)/month.}]$$
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P005 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013 and P014 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P006) - Expandable Polystyrene (EPS) molding machine HS 1300 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P006 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

### Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

### Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.

- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.

- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P007) - Expandable Polystyrene (EPS) molding machine HS 1300 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P001 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P008) - Expandable Polystyrene (EPS) molding machine installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P008 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P009) - Expandable Polystyrene (EPS) molding machine HS 1300 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P009 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013 and P014 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P010) - Expandable Polystyrene (EPS) molding machine HS 1300 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013 and P014 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P010 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (43.2 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P011) - Expandable Polystyrene (EPS) molding machine HS 1500 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 1.62 lbs/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P011 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 1.62 lbs/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (108 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P012) - Expandable Polystyrene (EPS) molding machine HS 1500 installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 1.62 lbs/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P012 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 1.62 lbs/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (108 lbs EPS resin/hr) times the pentane emission factor (0.015 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P013) - Warehouse installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 31.5 lbs/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P013 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 31.5 lbs/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (1050 lbs EPS resin/hr) times the pentane emission factor (0.03 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P014) - Aging bags installed pre 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 21.0 lbs/hr.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

3. The permit to install for this emissions unit P014 was evaluated based on the sum of the emissions from all stacks, and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Pentane

TLV(mg/m3): 1770.55

Maximum Hourly Emission Rate (lbs/hr): 45.17

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m3): 232.2

MAGLC(ug/m3): 42,156

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:

The organic compound (OC) (pentane) emissions from this emissions unit shall not exceed 21.0 lbs/hr.

Applicable Compliance Method:

The emission limitation is based upon the unit's potential to emit, which was determined by multiplying the maximum hourly process rate (1050 lbs EPS resin/hr) times the pentane emission factor (0.02 lb pentane emissions/lb EPS), as certified by the manufacturer (HIRSCH Maschinenbau 9/13/2005).

- b. Emission limitation:

The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
- b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
- c. The emission testing shall be conducted using industry acceptable test methods.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

- 1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.
- 2. Terms in this permit supercede those identified in PTI 08-04731 issued 01/24/2006 and resulted in no increase of OC emissions.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

**Operations, Property, and/or Equipment - (P015) - Expandable Polystyrene (EPS) molding machine KPS25 installed post 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See.A.2.a.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than ten tons per year.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:
 

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.
  - d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
6. The permittee shall submit an annual report to the director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

#### **E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission limitation:  
The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-

month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
  - b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
  - c. The emission testing shall be conducted using industry acceptable test methods.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
  - e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
  - f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

## F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

**Operations, Property, and/or Equipment - (P016) - Expandable Polystyrene (EPS) molding machine KPS25 installed post 08/03/2006**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See.A.2.a.
OAC rule 3745-31-05(C) (Synthetic minor to avoid Title V and major non-attainment NSR)	The total allowable OC (pentane) emissions rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation combined.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than ten tons per year.
- 2.b The maximum pentane content of the EPS beads, incoming from the bead supplier shall not exceed 6 percent by weight.

**B. Operational Restrictions**

1. The maximum annual EPS resin usage rate for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 shall not exceed 2,500,000 tons per year, based upon a rolling, 12-month summation of the monthly EPS resin usage rate.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the EPS resin usage levels

specified in the following table for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined.

<u>Month(s)</u>	<u>Maximum Allowable Cumulative EPS resin usage (pounds)</u>
1	208,334
1-2	416,668
1-3	625,002
1-4	833,336
1-5	1,041,670
1-6	1,250,004
1-7	1,458,338
1-8	1,666,672
1-9	1,875,006
1-10	2,083,340
1-11	2,291,674
1-12	2,500,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual EPS resin usage limitation shall be based upon a rolling, 12-month summation of the EPS resin usage rate.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the chemical analyses of the EPS resin provided by the supplier for each lot, shipment or box of EPS resin delivered to the facility. The analysis shall include the percent (%) by weight pentane in the EPS resins.
2. The permittee shall collect and record the following information each month for emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016 combined:
  - a. The EPS resin usage rate, in pounds, for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the EPS resin usage rate in pounds.
  - c. The actual total OC (pentane) emissions in tons for each month, which shall be determine as follows:

[pentane loss from each emissions unit (lb pentane/lb EPS resins) x the actual EPS resin usage rate from C.2.a. (lbs of EPS resin/month) = tons OC (pentane)/month.

- d. The total OC emissions (pentane) in tons, for the rolling, 12-month period.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions (pentane) exceeded the 74.9 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month OC emissions for each such month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the pentane content of the EPS resin exceeded 6%, and the actual pentane content of the EPS resins for each such month.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative EPS resin usage levels in Section B.1.
4. These quarterly deviation reports (excursion) shall be submitted to the Ohio EPA District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
5. The permittee shall submit annual reports that specify the total actual annual OC (pentane) emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
6. The permittee shall submit an annual report to the director (the appropriate District Office or local air agency) in writing, of whether the operations of the source are consistent with the information regarding the operations that was used to conduct the modeling. The director may consider any significant departure from the operations of the source described in the permit to install application that results in greater emissions than the emissions rate modeled to determine the ground level concentration as a modification and require the owner or operator to submit a permit to install application for the increased emissions.

#### E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission limitation:  
The total allowable OC emissions (pentane) rate from emission units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013,

P014, P015 and P016 shall not exceed 74.9 tons/yr, based upon a rolling, 12-month summation of the monthly OC emissions from the processing of EPS resin.

Applicable Compliance Method:

Compliance with the annual OC emission (pentane) limitation shall be based on the record keeping requirements specified in section C.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted 6 months after permit issuance and/or operation.
  - b. The emission testing shall be conducted to demonstrate compliance with the loss percentages of pentane from the pre-expanders, molding machines, aging bags and warehouse.
  - c. The emission testing shall be conducted using industry acceptable test methods.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA District Office or RAPCA.
  - e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).
  - f. Personnel from the Ohio EPA District Office or RAPCA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or RAPCA.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C.1, C.2, D and E.