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Facility Name: **O-Cedar Brands, Inc**

Application Number: **08-3868**

Date: **October 21, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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.

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after

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commencement of operation.

SOURCE OPERATION 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 and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **O-Cedar Brands, Inc** located in **Clark** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P006	Large hydrasealer; sponge heat bonding process	*	3745-31-05	0.44 lb/hour, 10.56 lbs/day, 320 lbs/month, and 1.93 TPY organic compounds (OC)
			3745-21-07 (G)(2)	less stringent than the OC limits established above

- * BAT is compliance with applicable OAC rules and specified allowables mass emission rates; recordkeeping; and quarterly deviation reporting.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic compounds	1.93

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control Agency, 451 West Third Street, P.O. Box 972, Dayton, Ohio 45422.**

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Regional Air Pollution Control Agency, 451 West Third Street, P.O. Box 972, Dayton, Ohio 45422.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Additional Terms and Conditions

1. The 0.44 lb/hour limit is established for permit to install 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 limit.

B. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the hydrasealing operation:
 - a. the company identification of the hydrasealant employed;
 - b. the number of sponge assemblies produced;
 - c. the total organic compound emission rate for all

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- sponge assemblies produced, in pounds per month; (see calculation methodology in D.1.c.)
 - d. the total number of days the emissions unit was in operation; and,
 - e. the average daily organic compound emission rate for all sponge assemblies produced, i.e., (c)/(d), in pounds per day (average).
- 2. 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 the permit. Such records may be maintained in computerized form.

C. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the average daily organic compound emission rate from the hydrasealing process exceeded 10.56 pounds per day, and the actual average daily organic compound emissions for each such month; and, .
 - b. an identification of each month during which the organic compound emission rate from the hydrasealing process exceeded 320 pounds per month, and the actual organic compound emissions for each such month.
- 2. These quarterly deviation (excursion) reports shall be submitted in the following manner:
 - a. reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control 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 record keeping requirements specified in this permit, (b) the

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probable cause of such deviations, and © any corrective actions or preventative measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

D. Testing Requirements and Compliance Determinations

1. Compliance with the emission limitation(s) in these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation - 0.44 lb/hour organic compounds

Applicable Compliance Method - Compliance shall be determined by multiplying the maximum number of sponge assemblies produced per hour, 3600 sponge assemblies, by the tested mass balance emission factor of 0.055 gram/sponge assembly and dividing by 454 grams/pound.

b. Emission Limitation - 10.56 lbs/day organic compounds

Applicable Compliance Method - Compliance shall be based upon record keeping as specified in section B.1.

c. Emission Limitation - 320 lbs/month organic compounds

Applicable Compliance Method - Compliance shall be based upon record keeping as specified in section B.1. and shall be determined by multiplying the number of sponge assemblies produced for the month by the tested mass balance emission factor of 0.055 gram/sponge assembly and dividing by 454 grams/pound.

d. Emission Limitation - 1.93 TPY organic compounds
Applicable Compliance Method - Compliance shall be based upon record keeping as specified in B.1. and

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shall be the sum of the 12 monthly organic compound
emission rates for the calendar year.