

Synthetic Minor Determination and/or Netting Determination
Permit To Install: "03-17334"

A. Source Description

Tegrant Diversified Brands, Inc. is proposing to install four new mold presses at their current expandable foam molding operation located in Marion, Ohio (Marion County)

B. Facility Emissions and Attainment Status

The facility is currently a synthetic minor facility for volatile organic compounds (VOC) for Prevention of Significant Deterioration (PSD) purposes. Tegrant is major for VOC for Title V purposes. Marion county is in attainment/unclassifiable for all criteria pollutants.

C. Source Emissions

The four new mold presses have a potential to emit of 14.80 tons VOC per year. The current expandable foam molding operations have a combined synthetic minor limitation of 200 tons of VOC per rolling 12-month period based on the VOC content and throughput restrictions of raw material. Tegrant has requested that the four new mold presses be incorporated into the facility's current synthetic minor VOC limitation.

D. Conclusion

With the incorporation of the four new mold presses into the facility's current synthetic minor limitation of 200 tons per rolling 12-month period, the facility will continue to have a potential to emit well below the PSD major source threshold of 250 tons of VOC per year.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

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

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL

MARION COUNTY

Application No: 03-17334

Fac ID: 0351010180

DATE: 3/4/2008

Tegrant Diversified Brands, Inc.
Victoria Brind Amour
PO Box 448 800 Fifth Avenue
New Brighton, PA 15066-0448

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

MARION COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17334 FOR AN AIR CONTAMINANT SOURCE
FOR Tegrant Diversified Brands, Inc.

On 3/4/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Tegrant Diversified Brands, Inc.**, located at **1836 Likens Road, Marion, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17334:

4 molding presses.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-17334

Application Number: 03-17334
Facility ID: 0351010180
Permit Fee: **To be entered upon final issuance**
Name of Facility: Tegrant Diversified Brands, Inc.
Person to Contact: Victoria Brind Amour
Address: PO Box 448 800 Fifth Avenue
New Brighton, PA 15066-0448

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1836 Likens Road
Marion, Ohio**

Description of proposed emissions unit(s):
4 molding presses.

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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	200

Tegant Diversified Brands, Inc.

Facility ID: 0351010180

PTI Application: 03-17334

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P805) - Mold Press #3 (model # 1014, serial #3410-99)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a.
OAC rule 3745-31-05(C)	200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined (See A.I.2.b)
OAC rule 3745-21-07(G)	None (See A.I.2.c)

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 OC emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than 10 tons/yr.
- 2.b Annual emissions of OC (stack and fugitive) shall not exceed 200 tons per rolling 12-month period from emission units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined. The emission limitation is based on OC content and bead throughput restrictions (See A.II.1 & A.II.2) for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions.
- 2.c OAC rule 3745-21-07(G) is not applicable because this emissions unit does not use liquid organic materials.

II. Operational Restrictions

1. The OC content of the polymer beads employed in this emissions unit shall not exceed the following limits:
 - a. EPS beads - 6.7%, in weight percent (as received)

- b. ARCEL beads - 13.0%, in weight percent (as received).
2. The maximum rolling 12-month bead throughput for this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000\text{ lbs})] \leq 200.0$$

Where,

M = the increment of the rolling 12-month period;

n = individual bead lots processed during the period;

U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

This emissions unit has been in operation for greater than 12 months, and as such has records to demonstrate compliance with the rolling 12-month restrictions upon issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information each month for this emissions unit:
- the company identification of each lot of polymer bead processed;
 - the OC content, in weight percent, for each lot of polymer bead processed;
 - the quantity, in tons, of each lot of polymer bead processed;
 - the calculated OC emissions from each lot of polymer bead processed, in tons, using the following equations:

$$E_n = \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000\text{ lbs})]$$

Where,

E_n = OC emissions from individual bead lots processed;

n = individual bead lots processed during the period;

U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

- e. The total OC emissions rate of all beads processed, in tons/month, calculated as follows:

$$E_M = E_1 + E_2 + E_3 + \dots + E_n$$

Where:

E_M = Monthly OC emissions, in tons/month; and,

E_n = OC emissions from individual bead lots processed (A.III.1.d)

- f. the rolling, 12-month OC emission rate calculated as follows:

$$E_T = E_{M1} + E_{M2} + E_{M3} + \dots + E_{M12}$$

Where:

E_T = Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions;

E_M = Monthly OC emissions (tons/month).

- 2. The permittee shall require the bead supplier to submit an OC content analysis (in weight percent) for each lot of polymer beads received and shall maintain records of such analysis.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:
 - a. the 200 tons of OC per rolling, 12-month period emission limitation;
 - b. the rolling, 12-month bead throughput restriction specified in A.II.2.
 - c. the OC content restrictions for beads processed as specified in A.II.1.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: 200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined.

Tegant Diversified Brands, Inc.

PTI Application: 03-17334

Issued: To be entered upon final issuance

Facility ID: 0351010180

Emissions Unit ID: P805

Applicable Compliance Method: The permittee shall demonstrate compliance with the tons per rolling 12-month period limitation by the record keeping in section A.III.1.

VI. Miscellaneous Requirements

None

Tegant Diversified Brands, Inc.
PTI Application: 03-17334
Issued: To be entered upon final issuance

Facility ID: 0351010180
Emissions Unit ID: P805

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P805) - Mold Press #3 (model #1014, serial #3410-99)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1 through B.III.4 and B.IV.1

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this/these emissions units P005 and P801 - P808 was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Pentane

TLV (mg/m³): 1771

Maximum Hourly Emission Rate (lbs/hr): 80.3* (stack + fugitive)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,523

MAGLC (ug/m³): 42,100

*Includes emissions from P005 and P801 - P808

The permittee, has demonstrated that emissions of pentane, from emissions units P005 and P801 - P808, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- 3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- 4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level

concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P806) - Mold Press #4 (model #1318, serial #3655-01)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a.
OAC rule 3745-31-05(C)	200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined (See A.I.2.b)
OAC rule 3745-21-07(G)	None (See A.I.2.c)

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 OC emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than 10 tons/yr.
- 2.b Annual emissions of OC (stack and fugitive) shall not exceed 200 tons per rolling 12-month period from emission units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined. The emission limitation is based on OC content and bead throughput restrictions (See A.II.1 & A.II.2) for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions.
- 2.c OAC rule 3745-21-07(G) is not applicable because this emissions unit does not use liquid organic materials.

II. Operational Restrictions

1. The OC content of the polymer beads employed in this emissions unit shall not exceed the following limits:

- a. EPS beads - 6.7%, in weight percent (as received)
 - b. ARCEL beads - 13.0%, in weight percent (as received).
2. The maximum rolling 12-month bead throughput for this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000 \text{ lbs})] \leq 200.0$$

Where,

M = the increment of the rolling 12-month period;

n = individual bead lots processed during the period;

U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

This emissions unit has been in operation for greater than 12 months, and as such has records to demonstrate compliance with the rolling 12-month restrictions upon issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the company identification of each lot of polymer bead processed;
 - b. the OC content, in weight percent, for each lot of polymer bead processed;
 - c. the quantity, in tons, of each lot of polymer bead processed;
 - d. the calculated OC emissions from each lot of polymer bead processed, in tons, using the following equations:

$$E_n = \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000 \text{ lbs})]$$

Where,

E_n = OC emissions from individual bead lots processed;

n = individual bead lots processed during the period;

U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

- e. The total OC emissions rate of all beads processed, in tons/month, calculated as follows:

$$E_M = E_1 + E_2 + E_3 + \dots + E_n$$

Where:

E_M = Monthly OC emissions, in tons/month; and,

E_n = OC emissions from individual bead lots processed (A.III.1.d)

- f. the rolling, 12-month OC emission rate calculated as follows:

$$E_T = E_{M1} + E_{M2} + E_{M3} + \dots + E_{M12}$$

Where:

E_T = Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions;

E_M = Monthly OC emissions (tons/month).

2. The permittee shall require the bead supplier to submit an OC content analysis (in weight percent) for each lot of polymer beads received and shall maintain records of such analysis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:
- the 200 tons of OC per rolling, 12-month period emission limitation;
 - the rolling, 12-month bead throughput restriction specified in A.II.2.
 - the OC content restrictions for beads processed as specified in A.II.1.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

Tegant Diversified Brands, Inc.

PTI Application: 03-17334

Issued: To be entered upon final issuance

Facility ID: 0351010180

Emissions Unit ID: P806

- a. Emission Limitation: 200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined.

Applicable Compliance Method: The permittee shall demonstrate compliance with the tons per rolling 12-month period limitation by the recordkeeping in section A.III.1.

VI. Miscellaneous Requirements

None

Tegrant Diversified Brands, Inc.
PTI Application: 03-17334
Issued: To be entered upon final issuance

Facility ID: 0351010180
Emissions Unit ID: P806

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P806) - Mold Press #4 (model #1318, serial #3655-01)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1 through B.III.4 and B.IV.1

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this/these emissions units P005 and P801 - P808 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Pentane

TLV (mg/m³): 1771

Maximum Hourly Emission Rate (lbs/hr): 80.3* (stack + fugitive)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,523

MAGLC (ug/m³): 42,100

*Includes emissions from P005 and P801 - P808

The permittee, has demonstrated that emissions of pentane, from emissions units P005 and P801 - P808, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- 3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- 4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level

concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P807) - Mold Press #5 (model #1318, serial #3161-98)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a.
OAC rule 3745-31-05(C)	200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined (See A.I.2.b)
OAC rule 3745-21-07(G)	None (See A.I.2.c)

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 OC emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than 10 tons/yr.
- 2.b Annual emissions of OC (stack and fugitive) shall not exceed 200 tons per rolling 12-month period from emission units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined. The emission limitation is based on OC content and bead throughput restrictions (See A.II.1 & A.II.2) for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions.
- 2.c OAC rule 3745-21-07(G) is not applicable because this emissions unit does not use liquid organic materials.

II. Operational Restrictions

1. The OC content of the polymer beads employed in this emissions unit shall not exceed the following limits:

- a. EPS beads - 6.7%, in weight percent (as received)
 - b. ARCEL beads - 13.0%, in weight percent (as received).
2. The maximum rolling 12-month bead throughput for this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000 \text{ lbs})] \leq 200.0$$

Where,

M = the increment of the rolling 12-month period;
 n = individual bead lots processed during the period;
 U_n = total throughput of the individual beads in lot n, in pounds;
 C_n = OC content in weight % for each individual lot n
 0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

This emissions unit has been in operation for greater than 12 months, and as such has records to demonstrate compliance with the rolling 12-month restrictions upon issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the company identification of each lot of polymer bead processed;
 - b. the OC content, in weight percent, for each lot of polymer bead processed;
 - c. the quantity, in tons, of each lot of polymer bead processed;
 - d. the calculated OC emissions from each lot of polymer bead processed, in tons, using the following equations:

$$E_n = \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000 \text{ lbs})]$$

Where,

E_n = OC emissions from individual bead lots processed;
 n = individual bead lots processed during the period;
 U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

- e. The total OC emissions rate of all beads processed, in tons/month, calculated as follows:

$$E_M = E_1 + E_2 + E_3 + \dots + E_n$$

Where:

E_M = Monthly OC emissions, in tons/month; and,

E_n = OC emissions from individual bead lots processed (A.III.1.d)

- f. the rolling, 12-month OC emission rate calculated as follows:

$$E_T = E_{M1} + E_{M2} + E_{M3} + \dots + E_{M12}$$

Where:

E_T = Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions;

E_M = Monthly OC emissions (tons/month).

2. The permittee shall require the bead supplier to submit an OC content analysis (in weight percent) for each lot of polymer beads received and shall maintain records of such analysis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:
- the 200 tons of OC per rolling, 12-month period emission limitation;
 - the rolling, 12-month bead throughput restriction specified in A.II.2.
 - the OC content restrictions for beads processed as specified in A.II.1.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

Tegant Diversified Brands, Inc.

PTI Application: 03-17334

Issued: To be entered upon final issuance

Facility ID: 0351010180

Emissions Unit ID: P807

- a. Emission Limitation: 200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined.

Applicable Compliance Method: The permittee shall demonstrate compliance with the tons per rolling 12-month period limitation by the recordkeeping in section A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P807) - Mold Press #5 (model #1318, serial #3161-98)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1 through B.III.4 and B.IV.1

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this/these emissions units P005 and P801 - P808 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Pentane

TLV (mg/m³): 1771

Maximum Hourly Emission Rate (lbs/hr): 80.3* (stack + fugitive)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,523

MAGLC (ug/m³): 42,100

*Includes emissions from P005 and P801 - P808

The permittee, has demonstrated that emissions of pentane, from emissions units P005 and P801 - P808, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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Emissions Unit ID: P807

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P808) - Mold Press #6 (model #1014, serial #2840-97)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a.
OAC rule 3745-31-05(C)	200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined (See A.I.2.b)
OAC rule 3745-21-07(G)	None (See A.I.2.c)

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 OC emissions from this air contaminant source since the uncontrolled potential to emit for OC emissions is less than 10 tons/yr.
- 2.b Annual emissions of OC (stack and fugitive) shall not exceed 200 tons per rolling 12-month period from emission units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined. The emission limitation is based on OC content and bead throughput restrictions (See A.II.1 & A.II.2) for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, emission limitations on OC effectively restrict volatile organic compound (VOC) emissions.
- 2.c OAC rule 3745-21-07(G) is not applicable because this emissions unit does not use liquid organic materials.

II. Operational Restrictions

1. The OC content of the polymer beads employed in this emissions unit shall not exceed the following limits:

- a. EPS beads - 6.7%, in weight percent (as received)
 - b. ARCEL beads - 13.0%, in weight percent (as received).
2. The maximum rolling 12-month bead throughput for this emissions unit is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000 \text{ lbs})] \leq 200.0$$

Where,

M = the increment of the rolling 12-month period;

n = individual bead lots processed during the period;

U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

This emissions unit has been in operation for greater than 12 months, and as such has records to demonstrate compliance with the rolling 12-month restrictions upon issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the company identification of each lot of polymer bead processed;
 - b. the OC content, in weight percent, for each lot of polymer bead processed;
 - c. the quantity, in tons, of each lot of polymer bead processed;
 - d. the calculated OC emissions from each lot of polymer bead processed, in tons, using the following equations:

$$E_n = \sum_n [(U_n)(C_n/100)(0.97)(1\text{ton}/2000 \text{ lbs})]$$

Where,

E_n = OC emissions from individual bead lots processed;

n = individual bead lots processed during the period;

U_n = total throughput of the individual beads in lot n, in pounds;

C_n = OC content in weight % for each individual lot n

0.97 = 97% emission rate of OC contained in beads (3% of the OC is retained in the foam)

- e. The total OC emissions rate of all beads processed, in tons/month, calculated as follows:

$$E_M = E_1 + E_2 + E_3 + \dots + E_n$$

Where:

E_M = Monthly OC emissions, in tons/month; and,

E_n = OC emissions from individual bead lots processed (A.III.1.d)

- f. the rolling, 12-month OC emission rate calculated as follows:

$$E_T = E_{M1} + E_{M2} + E_{M3} + \dots + E_{M12}$$

Where:

E_T = Annual OC emissions (tons) as summed from the previous 12 months of monthly OC emissions;

E_M = Monthly OC emissions (tons/month).

2. The permittee shall require the bead supplier to submit an OC content analysis (in weight percent) for each lot of polymer beads received and shall maintain records of such analysis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:
- the 200 tons of OC per rolling, 12-month period emission limitation;
 - the rolling, 12-month bead throughput restriction specified in A.II.2.
 - the OC content restrictions for beads processed as specified in A.II.1.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

Tegant Diversified Brands, Inc.

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Issued: To be entered upon final issuance

Facility ID: 0351010180

Emissions Unit ID: P808

- a. Emission Limitation: 200 tons of OC per rolling, 12-month period (stack and fugitive emissions) from emissions units P005, P801, P802, P803, P804, P805, P806, P807 and P808 combined.

Applicable Compliance Method: The permittee shall demonstrate compliance with the tons per rolling 12-month period limitation by the recordkeeping in section A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P808) - Mold Press #6 (model #1014, serial #2840-97)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01 ORC 3704.03(F)	See B.III.1 through B.III.4 and B.IV.1

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this/these emissions units P005 and P801 - P808 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Pentane

TLV (mg/m³): 1771

Maximum Hourly Emission Rate (lbs/hr): 80.3* (stack + fugitive)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,523

MAGLC (ug/m³): 42,100

*Includes emissions from P005 and P801 - P808

The permittee, has demonstrated that emissions of pentane, from emissions units P005 and P801 - P808, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- 2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- 3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- 4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant

Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-17334 Facility ID: 0351010180

FACILITY NAME Tegrant Diversified Brands, Inc.

FACILITY DESCRIPTION Plastic Foam Parts CITY/TWP Marion

SIC CODE 3 3086 SCC CODE 9-99-999-99 EMISSIONS UNIT ID P805

EMISSIONS UNIT DESCRIPTION Mold Press #3 (model #1014, serial #3410-99)

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.78 lb/hr (stack)	11.43 (stack + fugitive)	0.78 lb/hr (stack)	200 (combined P005, P801-P808)
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit and OAC rule 3745-31-05(C).

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: pentane

NEW SOURCE REVIEW FORM B

PTI Number: 03-17334 Facility ID: 0351010180

FACILITY NAME Tegrant Diversified Brands, Inc.

FACILITY DESCRIPTION Plastic Foam Parts CITY/TWP Marion

SIC CODE 3086 SCC CODE 9-99-999-99 EMISSIONS UNIT ID P806

EMISSIONS UNIT DESCRIPTION Mold Press #4 (model #1318, serial #3655-91)

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.91 lb/hr (stack)	13.36 (stack + fugitive)	0.91 lb/hr (stack)	200 (combined P005, P801-P808)
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit and OAC rule 3745-31-05(C).

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: pentane

NEW SOURCE REVIEW FORM B

PTI Number: 03-17334 Facility ID: 0351010180

FACILITY NAME Tegrant Diversified Brands, Inc.

FACILITY DESCRIPTION Plastic Foam Parts CITY/TWP Marion

SIC CODE 33086 SCC CODE 9-99-999-99 EMISSIONS UNIT ID P807

EMISSIONS UNIT DESCRIPTION Mold Press #5 (model #1318, serial #3161-98)

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.91 lb/hr (stack)	13.36 (stack + fugitive)	0.91 lb/hr (stack)	200 (combined P005, P801-P808)
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit and OAC rule 3745-31-05(C).

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: pentane

NEW SOURCE REVIEW FORM B

PTI Number: 03-17334 Facility ID: 0351010180

FACILITY NAME Tegrant Diversified Brands, Inc.

FACILITY DESCRIPTION Plastic Foam Parts CITY/TWP Marion

SIC CODE 3086 SCC CODE 9-99-999-99 EMISSIONS UNIT ID P808

EMISSIONS UNIT DESCRIPTION Mold Press #6 (model #1014, serial #2840-97)

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.78 lb/hr (stack)	11.43 (stack + fugitive)	0.78 lb/hr (stack)	200 (combined P005, P801-P808)
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit and OAC rule 3745-31-05(C).

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: pentane