



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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

Mailing Address:

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

02/07/05

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

03-88-01-0051  
Bridgestone APM Company - Foam Products Division  
Joseph W Clark  
1800 Industrial Drive  
Findlay, OH 45840

Dear Joseph W Clark:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

**Ohio EPA, Division of Air Pollution Control  
Permit Issuance and Data Management Section  
Draft Title V Permit Correspondence  
122 South Front Street  
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northwest District Office.

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA (electronically submitted)  
File, DAPC PMU  
Northwest District Office



State of Ohio Environmental Protection Agency

**DRAFT TITLE V PERMIT**

Issue Date: 02/07/05	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-88-01-0051 to:  
Bridgestone APM Company - Foam Products Division  
Michigan

**Emissions Unit ID (Company ID)/Emissions Unit Activity Description**

P004 (Auto Glue Station) Automatic Glue Station	Mold Release, Pouring, Scraping/Demolding, and Cure Oven - Line #2	Mold Release, Pouring, Scraping/Demolding, Cure Oven, and Post Cure Oven - Line #1
P005 (Line #2)	P006 (Line #1)	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office  
(419) 352-8461  
01/01/00

OHIO ENVIRONMENTAL PROTECTION AGENCY

\_\_\_\_\_  
Joseph P. Koncelik  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement overrides the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. **Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. **Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**11. Federal and State Enforceability**

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

*(Authority for term: OAC rule 3745-77-07(B))*

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local

air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).  
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.  
(Authority for term: OAC rule 3745-77-07(G))

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

**18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

**19. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**2. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**5. 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.

**6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

1. The following insignificant emissions unit is located at this facility:

Z005 - Air Make-Up Unit.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more of the applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

### **B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - Mold Release Bake Ovens;  
Z002 - Offline Finishing;  
Z003 - Line #1, EA Pad; and  
Z004 - Line #2, EA Pad.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Auto Glue Station (P004)  
**Activity Description:** Automatic Glue Station

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
robotic adhesive applicator (automotive seat assembly), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI 03-13256, issued November 23, 1999)	6.9 lbs of organic compounds (OC)/hr 30.2 tons of OC/year
		See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	None, see section A.II.1 below.
	OAC rule 3745-17-11(B)(1)	0.551 lb of particulate emissions (PE)/hr [based on Table I of OAC rule 3745-17-11]
	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

- 2.a The 6.9 lbs OC/hr and 30.2 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

##### II. Operational Restrictions

- The permittee shall not employ any coating or cleanup material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

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

1. The permittee shall maintain the following information each month for this emissions unit:
  - a. the company identification for each coating and cleanup material employed; and
  - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-05(C)(5).

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Ohio EPA, Northwest District Office, in writing, of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Northwest District Office within 30 days after the event occurs.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

### V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be determined in accordance with the following methods:

- 1.a Emission Limitations:  
6.9 lbs OC/hr, 30.2 tons OC/yr

Applicable Compliance Method:

The hourly OC emission limitation was established based on multiplying the maximum production capacity of the emissions unit (930 parts/hr) by the maximum application rate of OC (105 grams OC/part), and then dividing by 454 gr/lb.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with U.S. EPA Test Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly limitation by the maximum number of hours of operation (8760 hrs/yr), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

**1.b** Emission Limitation: 0.551 lb of PE/hr

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation may be used for the adhesive spraying operation:

$E = \text{PE rate (lbs/hr)}$

$E = (\text{actual coating solids usage rate, in lbs/hr}) \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (40% considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-03(B)(10), and 3745-77-07(C)(1)]

**1.c** Emission Limitation: Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-03(B)(1), and 3745-77-07(C)(1)]

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
robotic adhesive applicator (automotive seat assembly)	none	none

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for this emissions unit was evaluated based on the actual materials employed (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each toxic pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Toluene  
 TLV (ug/m3): 188,000  
 Maximum Hourly Emission Rate (lbs/hr): 6.1  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 179.5  
 MAGLC (ug/m3): 4,476

- Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee shall not make the change. Changes that can affect the parameters used in the "Air Toxics Policy" include the following:
  - changes in the composition of the materials used, or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

### **III. Monitoring and/or Record Keeping Requirements (continued)**

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Line #2 (P005)

**Activity Description:** Mold Release, Pouring, Scraping/Demolding, and Cure Oven - Line #2

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polyurethane foam seat line 2 - mixing, mold waxing, pouring with cure oven, demold, crushing and post-cure oven operation	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	See requirements for mold waxing, pouring with cure oven, and post-cure oven below.
mold waxing	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	13.15 lbs organic compounds (OC)/hr; 57.60 tons OC/year  0.05 lb particulate emissions (PE)/hr; 0.22 ton PE/year  Visible PE shall not exceed 0% opacity, as a six-minute average.  See section A.I.2.a.
	OAC rule 3745-17-11(B)	See section A.I.2.c.
	OAC rule 3745-17-07(A)	See section A.I.2.d.
	OAC rule 3745-21-07(G)(2)	None, see section A.II.1.
pouring with cure oven	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	1.54 lbs OC/hr; 6.75 tons OC/year, from pouring only (See section A.I.2.k.)  1.34 lbs nitrogen oxides (NOx)/hr; 5.87 tons NOx/year  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G), 3745-23-06(B) and 3745-21-08(B).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
post-cure oven	OAC rule 3745-21-07(G)(1)	3 lbs OC /hr, 15 lbs OC /day (See section A.I.2.k.)
	OAC rule 3745-21-07(G)(2)	None, see section A.II.1.
	OAC rule 3745-23-06(B) OAC rule 3745-21-08(B)	See section A.I.2.e.
	OAC rule 3745-17-11(B)	See section A.I.2.f.
	OAC rule 3745-17-07(A)	See section A.I.2.g.
	OAC rule 3745-18-06(E)	See section A.I.2.h.
	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	0.40 lb NOx/hr; 1.75 tons NOx /year (for emissions units P005 and P006, combined) (See section A.I.2.b.)
		See section A.I.2.j.
	OAC rule 3745-21-07(G)(1)	See section A.I.2.i.
	OAC rule 3745-23-06(B)	See section A.I.2.e.
	OAC rule 3745-21-08(B)	See section A.I.2.e.
	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	40 CFR Part 63.1290 (MACT Subpart III)	formulation prohibitions, work practice standards, for hazardous air pollutants (HAPs) (See sections A.II.4 and A.II.5)

## 2. Additional Terms and Conditions

- 2.a** Best available technology (BAT) for the mold waxing associated with this emissions unit has been determined to be the use of a carbon mat filter for controlling PE.
- 2.b** The permittee has requested combined NOx emission limitations for the post-cure oven associated with emissions units P005 and P006 because both emissions units share this oven.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.e** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13782.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## 2. Additional Terms and Conditions (continued)

- 2.f** The uncontrolled mass rate of particulate emissions\* from pouring with cure oven operations associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- \* The burning of natural gas is the only source of PE from pouring with cure oven operations.
- 2.g** The pouring with cure oven operations associated with this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because pouring with cure oven operations is not subject to the requirements of OAC rule 3745-17-11.
- 2.h** The process weight rate for the pouring with cure oven operation associated with this emissions unit is less than 1000 pounds per hour. Therefore, pursuant to OAC rule 3745-18-06(C), the pouring with cure oven operation is exempt from OAC rule 3745-18-06(E).
- 2.i** OAC rule 3745-21-07(G)(1) is not applicable to the post-cure oven operations associated with this emissions unit because no liquid organic material is employed in this emissions unit.
- 2.j** The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-23-06(B) and 3745-21-08(B) and 40 CFR 63.1290 et seq.
- 2.k** The OC emission limitations established per OAC rule 3745-31-05(A)(3) for the 'pouring with cure oven' section of the operations are for pouring only; i.e., the emissions from the closed molds associated with the cure oven subject to OAC rule 3745-21-07(G)(1) are assumed to be negligible.
- 2.l** OAC Chapter 3745-18 does not establish sulfur dioxide emission limitation for the post-cure oven operations associated with this emissions unit because it employs only natural gas as fuel.
- 2.m** The 13.15 lbs OC/hr and 1.54 lbs OC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

## II. Operational Restrictions

1. The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).  
[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]
2. The permittee shall operate the carbon mat filter whenever this emissions unit is in operation.  
[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]
3. The permittee shall burn only natural gas as fuel in this emissions unit.  
[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]
4. A HAP or HAP-based material shall not be used as an equipment cleaner to flush the mixhead, nor shall it be used elsewhere as an equipment cleaner in a molded flexible polyurethane foam process, with the following exception: Diisocyanates may be used to flush the mixhead and associated piping during periods of startup or maintenance, provided that the diisocyanate compounds are contained in a closed-loop system and are re-used in production.  
[Authority for term: 40 CFR 63.1300(a)]
5. A HAP-based mold release agent shall not be used in a molded flexible polyurethane foam source process.  
[Authority for term: 40 CFR 63.1300(a)]

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

1. The permittee shall maintain daily records that document any time periods when the carbon mat filter was not in service when the emissions unit was in operation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for the mold waxing material used in this emissions unit:

- a. the company identification for each mold waxing material employed;
- b. documentation on whether or not each mold waxing material employed is a photochemically reactive material;
- c. the number of pounds of each mold waxing material employed;
- d. the OC content, in weight percent, for each mold waxing material, as applied;
- e. the OC emission rate for each mold waxing material employed (c x d), in pounds;
- f. the total OC emission rate for all the mold waxing materials employed, in tons (sum of 'e' for all mold waxing materials x 1 ton /2000 lbs); and
- g. the annual, year-to-date OC emissions for all the mold waxing materials employed, in tons (sum of 'f' for each calendar month to date from January to December).

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for the pouring operations associated with this emissions unit:
- the company identification for each pouring material and pouring catalyst employed;
  - documentation on whether or not each pouring material and pouring catalyst is a photochemically reactive material;
  - the number of pounds of each pouring catalyst employed;
  - the OC content, in weight percent, for each pouring catalyst, as employed;
  - the OC emission rate for each pouring catalyst employed (c x d), in pounds;
  - the total OC emission rate for all the pouring catalysts employed, in tons (sum of 'e' for all pouring catalysts x 1 ton /2000 lbs);
  - the OC content for each pouring material, as applied, in lbs/gallon;
  - the number of gallons of each pouring material employed;
  - the OC emission rate for each pouring material employed (g x h), in pounds ;
  - the total OC emission rate for all the pouring materials employed, in tons (sum of 'i' for all pouring materials x 1 ton /2000 lbs);
  - the annual, year-to-date OC emissions for all the pouring catalysts and pouring materials employed, in tons/year (sums of 'f' and 'j' for each calendar month to date from January to December).

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

5. The permittee shall maintain the following records in accordance with 40 CFR Part 63.1307(g), (h):
- documentation on whether or not each equipment cleaning material contains HAP(s) other than diisocyanates used in accordance with section A.II.4; and
  - documentation on whether or not each mold release material contains HAP(s).

[Authority for term: 40 CFR Part 63.1307(g), (h)]

6. The permittee shall perform daily checks, when the mold waxing is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the date and time of the visible emission observation;
  - the identification of the stack(s) observed;
  - the color of the emissions;
  - the total duration of any visible emission observation; and
  - the corrective actions, if any, taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any daily record showing that the carbon mat filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that summarize the actual annual OC emissions for the mold waxing and for the pouring operations associated with this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

5. In accordance with 40 CFR 63.1306(g), the permittee shall include the following in its annual compliance certification (see the General Terms and Conditions of this permit):

- a. each calendar day that a HAP-based material is used as an equipment cleaner (except for diisocyanates used in accordance with section A.II.4); and

- b. each calendar day that a HAP-based material is used as a mold release agent.

Failure to meet the requirements contained in sections A.II.4 and 5 shall be considered a violation of this permit. Violation of each item listed in 'a' and 'b' above shall be considered a separate violation.

[Authority for term: 40 CFR 63.1308(e) and 3745-77-07(C)(1)]

6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:  
13.15 lbs OC/hour, for mold waxing

Applicable Compliance Method:

The hourly OC emission limitation was established based on multiplying the maximum hourly gallon usage rate (2.12 gallons/hr) by the maximum OC content of the wax (6.20 lbs/gallon).

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

**1.b** Emission Limitation:  
57.60 tons OC/year, for mold waxing

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be determined based on the record keeping requirements established in section A.III.3 of this permit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

**1.c** Emission Limitation:  
0.05 lb PE/hour, for mold waxing

Applicable Compliance Method:

The permittee may determine compliance with the hourly PE limitation by utilizing the following equation:

$E \text{ (lbs/hr)} = (\text{maximum coating solids content, in lbs/gallon}) \times (\text{maximum coating usage rate, in gallons/hr}) \times (1 - \text{CE for carbon mat filter})$

where:

E = PE rate, in lbs/hr

Maximum coating solids content = 0.23 lb/gallon

Maximum gallon usage rate = 2.0 gallons/hr

CE = control efficiency of the control equipment (assumed to be 90% for carbon mat filter)

If required, the permittee shall demonstrate compliance with the hourly PE limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

**1.d** Emission Limitation:  
0.22 ton PE/year, for mold waxing

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

- 1.e** Emission Limitation:  
Visible PE shall not exceed 0% opacity, as a six-minute average, for the waxing operations

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.f** Emission Limitation:  
1.54 lb OC/hour, for pouring with cure oven operations

Applicable Compliance Method:

The hourly OC emission limitation was established based on the following:

$E \text{ (lbs/hr)} = [(\text{maximum pound usage rate for catalyst}) \times (\text{maximum OC content, weight percent, for catalyst}) \times (\text{percent of catalyst retained in foam})] + [(\text{maximum gallon usage rate for TDI}) \times (\text{maximum emission factor for TDI})] + [(\text{maximum gallon usage rate for mesamoll}) \times (\text{maximum OC content for Mesamoll, lbs/gallon})]$

where:

E = OC rate, in lbs/hr

maximum pound usage rate for catalyst = 30.10 lbs/hr

maximum percent weight OC for catalyst = 0.065%

percent of catalyst retained in foam = 98%

maximum gallon usage rate for TDI = 22 gallons/hr

maximum emission factor for TDI = 0.068 lb OC/gallon

maximum gallon usage rate for mesamoll = 0.30 gallon/hr

maximum OC content for mesamoll = 0.011 lb OC/gal

If required, the permittee shall demonstrate compliance with the hourly OC limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.g** Emission Limitation:  
6.75 tons OC/year, for pouring with cure oven operations

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be determined based on the record keeping requirements established in section A.III.4 of this permit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

- 1.h** Emission Limitation:  
1.34 lbs NOx /hour, for pouring with cure oven operations

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying an emission factor of 100 lbs NOx/mm cu. ft [AP-42, Chapter 1, Table 1.4-1 (revised 7/98)] by the maximum natural gas usage rate for the cure oven (mm cu. ft/hr).

If required, compliance with the hourly allowable NOx emission limitation shall be determined in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.i** Emission Limitation:  
5.87 tons NOx/year, for pouring with cure oven operations

Applicable Compliance Method:

The annual limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.j** Emission Limitations:  
0.40 lb NOx/hour and 1.75 tons NOx/year, for post-cure oven  
(for emissions units P005 and P006, combined)

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying an emission factor of 100 lbs NOx/mm cu. ft [AP-42, Chapter 1, Table 1.4-1 (revised 7/98)] by the maximum natural gas usage rate for the post-cure oven (mm cu. ft/hr)

If required, compliance with the hourly allowable NOx emission limitation shall be determined in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A, while emissions units P005 and P006 are in operation.

The annual limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.k** Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb PE /mmBtu limitation by dividing the emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbs PE (filterable)/mm cu. ft by the heat content for natural gas (950 Btu/cu. ft).

If required, compliance with the lb PE /mmBtu limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

[Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-03(B)(9), and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

- 1.l** Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, for the post-cure oven

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-03(B)(1), and 3745-77-07(C)(1)]

- 1.m** Emission Limitations:  
3 lbs OC/hour and 15 lbs OC/day, for the pouring cure oven

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations is assumed since the OC emissions from the closed molds associated with the cure oven are negligible.

If required, the permittee shall demonstrate compliance with the hourly OC limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all materials employed.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Line #1 (P006)

**Activity Description:** Mold Release, Pouring, Scraping/Demolding, Cure Oven, and Post Cure Oven - Line #1

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
polyurethane foam seat line 1 - mixing, mold waxing, pouring with cure oven, demold, crushing and post-cure oven operation	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	See requirements for mold waxing, pouring with cure oven, and post-cure oven below.
mold waxing	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	13.15 lbs organic compounds (OC)/hr; 57.60 tons OC/year  0.05 lb particulate emissions (PE)/hr; 0.22 ton PE/year  Visible PE shall not exceed 0% opacity, as a six-minute average.  See section A.I.2.a.
	OAC rule 3745-17-11(B)	See section A.I.2.c.
	OAC rule 3745-17-07(A)	See section A.I.2.d.
	OAC rule 3745-21-07(G)(2)	None, see section A.II.1.
pouring with cure oven	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	1.54 lbs OC/hr; 6.75 tons OC/year, from pouring only (See section A.I.2.k.)  1.34 lbs nitrogen oxides (NOx)/hr; 5.87 tons NOx/year  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G), 3745-23-06(B) and 3745-21-08(B).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
post-cure oven	OAC rule 3745-21-07(G)(1)	3 lbs OC /hr, 15 lbs OC /day (See section A.I.2.k.)
	OAC rule 3745-21-07(G)(2)	None, see section A.II.1.
	OAC rule 3745-23-06(B) OAC rule 3745-21-08(B)	See section A.I.2.e.
	OAC rule 3745-17-11(B)	See section A.I.2.f.
	OAC rule 3745-17-07(A)	See section A.I.2.g.
	OAC rule 3745-18-06(E)	See section A.I.2.h.
	OAC rule 3745-31-05(A)(3) (PTI 03-13782, issued April 6, 2004)	0.40 lb NOx/hr; 1.75 tons NOx /year (for emissions units P005 and P006, combined) (See section A.I.2.b.)
		See section A.I.2.j.
	OAC rule 3745-21-07(G)(1)	See section A.I.2.i.
	OAC rule 3745-23-06(B)	See section A.I.2.e.
	OAC rule 3745-21-08(B) OAC rule 3745-17-10(B)	See section A.I.2.e. 0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	40 CFR Part 63.1290 (MACT Subpart III)	formulation prohibitions, work practice standards, for hazardous air pollutants (HAPs) (See sections A.II.4 and A.II.5)

## 2. Additional Terms and Conditions

- 2.a** Best available technology (BAT) for the mold waxing associated with this emissions unit has been determined to be the use of a carbon mat filter for controlling PE.
- 2.b** The permittee has requested combined NOx emission limitations for the post-cure oven associated with emissions units P005 and P006 because both emissions units share this oven.
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.e** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13782.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## 2. Additional Terms and Conditions (continued)

- 2.f** The uncontrolled mass rate of particulate emissions\* from pouring with cure oven operations associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- \* The burning of natural gas is the only source of PE from pouring with cure oven operations.
- 2.g** The pouring with cure oven operations associated with this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because pouring with cure oven operations is not subject to the requirements of OAC rule 3745-17-11.
- 2.h** The process weight rate for the pouring with cure oven operation associated with this emissions unit is less than 1000 pounds per hour. Therefore, pursuant to OAC rule 3745-18-06(C), the pouring with cure oven operation is exempt from OAC rule 3745-18-06(E).
- 2.i** OAC rule 3745-21-07(G)(1) is not applicable to the post-cure oven operations associated with this emissions unit because no liquid organic material is employed in this emissions unit.
- 2.j** The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-23-06(B) and 3745-21-08(B) and 40 CFR 63.1290 et seq.
- 2.k** The OC emission limitations established per OAC rule 3745-31-05(A)(3) for the 'pouring with cure oven' section of the operations are for pouring only; i.e., the emissions from the closed molds associated with the cure oven subject to OAC rule 3745-21-07(G)(1) are assumed to be negligible.
- 2.l** OAC Chapter 3745-18 does not establish sulfur dioxide emission limitation for the post-cure oven operations associated with this emissions unit because it employs only natural gas as fuel.
- 2.m** The 13.15 lbs OC/hr and 1.54 lbs OC/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

## II. Operational Restrictions

1. The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).  
[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]
2. The permittee shall operate the carbon mat filter whenever this emissions unit is in operation.  
[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]
3. The permittee shall burn only natural gas as fuel in this emissions unit.  
[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]
4. A HAP or HAP-based material shall not be used as an equipment cleaner to flush the mixhead, nor shall it be used elsewhere as an equipment cleaner in a molded flexible polyurethane foam process, with the following exception: Diisocyanates may be used to flush the mixhead and associated piping during periods of startup or maintenance, provided that the diisocyanate compounds are contained in a closed-loop system and are re-used in production.  
[Authority for term: 40 CFR 63.1300(a)]
5. A HAP-based mold release agent shall not be used in a molded flexible polyurethane foam source process.  
[Authority for term: 40 CFR 63.1300(a)]

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

1. The permittee shall maintain daily records that document any time periods when the carbon mat filter was not in service when the emissions unit was in operation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for the mold waxing material used in this emissions unit:

- a. the company identification for each mold waxing material employed;
- b. documentation on whether or not each mold waxing material employed is a photochemically reactive material;
- c. the number of pounds of each mold waxing material employed;
- d. the OC content, in weight percent, for each mold waxing material, as applied;
- e. the OC emission rate for each mold waxing material employed (c x d), in pounds;
- f. the total OC emission rate for all the mold waxing materials employed, in tons (sum of 'e' for all mold waxing materials x 1 ton /2000 lbs); and
- g. the annual, year-to-date OC emissions for all the mold waxing materials employed, in tons (sum of 'f' for each calendar month to date from January to December).

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for the pouring operations associated with this emissions unit:
- the company identification for each pouring material and pouring catalyst employed;
  - documentation on whether or not each pouring material and pouring catalyst is a photochemically reactive material;
  - the number of pounds of each pouring catalyst employed;
  - the OC content, in weight percent, for each pouring catalyst, as employed;
  - the OC emission rate for each pouring catalyst employed (c x d), in pounds;
  - the total OC emission rate for all the pouring catalysts employed, in tons (sum of 'e' for all pouring catalysts x 1 ton /2000 lbs);
  - the OC content for each pouring material, as applied, in lbs/gallon;
  - the number of gallons of each pouring material employed;
  - the OC emission rate for each pouring material employed (g x h), in pounds ;
  - the total OC emission rate for all the pouring materials employed, in tons (sum of 'i' for all pouring materials x 1 ton /2000 lbs);
  - the annual, year-to-date OC emissions for all the pouring catalysts and pouring materials employed, in tons/year (sums of 'f' and 'j' for each calendar month to date from January to December).

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

5. The permittee shall maintain the following records in accordance with 40 CFR Part 63.1307(g), (h):
- documentation on whether or not each equipment cleaning material contains HAP(s) other than diisocyanates used in accordance with section A.II.4; and
  - documentation on whether or not each mold release material contains HAP(s).

[Authority for term: 40 CFR Part 63.1307(g), (h)]

6. The permittee shall perform daily checks, when the mold waxing is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the date and time of the visible emission observation;
  - the identification of the stack(s) observed;
  - the color of the emissions;
  - the total duration of any visible emission observation; and
  - the corrective actions, if any, taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any daily record showing that the carbon mat filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

2. The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that summarize the actual annual OC emissions for the mold waxing and for the pouring operations associated with this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

5. In accordance with 40 CFR 63.1306(g), the permittee shall include the following in its annual compliance certification (see the General Terms and Conditions of this permit):

- a. each calendar day that a HAP-based material is used as an equipment cleaner (except for diisocyanates used in accordance with section A.II.4); and

- b. each calendar day that a HAP-based material is used as a mold release agent.

Failure to meet the requirements contained in sections A.II.4 and 5 shall be considered a violation of this permit. Violation of each item listed in 'a' and 'b' above shall be considered a separate violation.

[Authority for term: 40 CFR 63.1308(e) and 3745-77-07(C)(1)]

6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### V. Testing Requirements

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

## V. Testing Requirements (continued)

- 1.a** Emission Limitation:  
13.15 lbs OC/hour, for mold waxing

**Applicable Compliance Method:**

The hourly OC emission limitation was established based on multiplying the maximum hourly gallon usage rate (2.12 gallons/hr) by the maximum OC content of the wax (6.20 lbs/gallon).

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.b** Emission Limitation:  
57.60 tons OC/year, for mold waxing

**Applicable Compliance Method:**

Compliance with the annual allowable OC emission limitation above shall be determined based on the record keeping requirements established in section A.III.3 of this permit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.c** Emission Limitation:  
0.05 lb PE/hour, for mold waxing

**Applicable Compliance Method:**

The permittee may determine compliance with the hourly PE limitation by utilizing the following equation:

$E \text{ (lbs/hr)} = (\text{maximum coating solids content, in lbs/gallon}) \times (\text{maximum coating usage rate, in gallons/hr}) \times (1 - \text{CE for carbon mat filter})$

where:

E = PE rate, in lbs/hr

Maximum coating solids content = 0.23 lb/gallon

Maximum gallon usage rate = 2.0 gallons/hr

CE = control efficiency of the control equipment (assumed to be 90% for carbon mat filter)

If required, the permittee shall demonstrate compliance with the hourly PE limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.d** Emission Limitation:  
0.22 ton PE/year, for mold waxing

**Applicable Compliance Method:**

The annual emission limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

**V. Testing Requirements (continued)**

- 1.e** Emission Limitation:  
Visible PE shall not exceed 0% opacity, as a six-minute average, for the waxing operations

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.f** Emission Limitation:  
1.54 lb OC/hour, for pouring with cure oven operations

Applicable Compliance Method:

The hourly OC emission limitation was established based on the following:

$$E \text{ (lbs/hr)} = [(\text{maximum pound usage rate for catalyst}) \times (\text{maximum OC content, weight percent, for catalyst}) \times (\text{percent of catalyst retained in foam})] + [(\text{maximum gallon usage rate for TDI}) \times (\text{maximum emission factor for TDI})] + [(\text{maximum gallon usage rate for mesamoll}) \times (\text{maximum OC content for Mesamoll, lbs/gallon})]$$

where:

E = OC rate, in lbs/hr

maximum pound usage rate for catalyst = 30.10 lbs/hr

maximum percent weight OC for catalyst = 0.065%

percent of catalyst retained in foam = 98%

maximum gallon usage rate for TDI = 22 gallons/hr

maximum emission factor for TDI = 0.068 lb OC/gallon

maximum gallon usage rate for mesamoll = 0.30 gallon/hr

maximum OC content for mesamoll = 0.011 lb OC/gal

If required, the permittee shall demonstrate compliance with the hourly OC limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.g** Emission Limitation:  
6.75 tons OC/year, for pouring with cure oven operations

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be determined based on the record keeping requirements established in section A.III.4 of this permit.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

## V. Testing Requirements (continued)

- 1.h** Emission Limitation:  
1.34 lbs NO<sub>x</sub> /hour, for pouring with cure oven operations

**Applicable Compliance Method:**

The permittee may demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation by multiplying an emission factor of 100 lbs NO<sub>x</sub>/mm cu. ft [AP-42, Chapter 1, Table 1.4-1 (revised 7/98)] by the maximum natural gas usage rate for the cure oven (mm cu. ft/hr).

If required, compliance with the hourly allowable NO<sub>x</sub> emission limitation shall be determined in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.i** Emission Limitation:  
5.87 tons NO<sub>x</sub>/year, for pouring with cure oven operations

**Applicable Compliance Method:**

The annual limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.j** Emission Limitations:  
0.40 lb NO<sub>x</sub>/hour and 1.75 tons NO<sub>x</sub>/year, for post-cure oven  
(for emissions units P005 and P006, combined)

**Applicable Compliance Method**

The permittee may demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation by multiplying an emission factor of 100 lbs NO<sub>x</sub>/mm cu. ft [AP-42, Chapter 1, Table 1.4-1 (revised 7/98)] by the maximum natural gas usage rate for the post-cure oven (mm cu. ft/hr)

If required, compliance with the hourly allowable NO<sub>x</sub> emission limitation shall be determined in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A, while emissions units P005 and P006 are in operation.

The annual limitation was developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 1.k** Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input

**Applicable Compliance Method:**

The permittee may demonstrate compliance with the lb PE /mmBtu limitation by dividing the emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbs PE (filterable)/mm cu. ft by the heat content for natural gas (950 Btu/cu. ft).

If required, compliance with the lb PE /mmBtu limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

[Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-03(B)(9), and 3745-77-07(C)(1)]

## **V. Testing Requirements (continued)**

- 1.l** Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, for the post-cure oven

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-03(B)(1), and 3745-77-07(C)(1)]

- 1.m** Emission Limitations:  
3 lbs OC/hour and 15 lbs OC/day, for the pouring cure oven

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations is assumed since the OC emissions from the closed molds associated with the cure oven are negligible.

If required, the permittee shall demonstrate compliance with the hourly OC limitation by testing in accordance with US EPA Methods 1-4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all materials employed.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

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**THIS IS THE LAST PAGE OF THE PERMIT**

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# Statement of Basis For Title V Permit

## Part I - General

Company Name	Bridgestone APM Co. - Foam Products		
Premise Number	03 88 01 0051		
What makes this facility a Title V facility?	VOC, HAP		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes		
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A		

## Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
None			

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P004	6.9 lb OC /hr, 30.2 tons /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P004 P005 P006	see OR in comments	21-07 (G)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - cannot use photochemically-reactive materials. M - Material composition tracking. Daily was chosen as a reasonable and practical monitoring frequency. ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.
P005 P006	13.15 lb OC /hr, 57.60 ton /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	* for mold waxing M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
P005	1.54 lb OC /hr, 6.75 ton /yr *	31-05		N	N	N	N	N	N	N	N	N	N	N	* for pouring with cure oven M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P006	1.53 lb OC /hr, 6.70 ton /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	Y	N	* for pouring with cure oven M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.

P005 P006	0.05 lb PE /hr, 0.22 ton /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	* for mold waxing M - Operational tracking of carbon mat filter. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P005 P006	0% opacity *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	* for mold waxing M -Carbon mat filter operational tracking provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None normally required for opacity alone.
P005 P006	1.34 lb NOx /hr, 5.87 ton/yr *	31-05		N	N	N	N	N	N	N	N	N	N	N	* for pouring with cure oven M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005 P006	0.40 lb NOx /hr, 1.75 ton /yr *	31-05		N	N	N	N	N	N	N	N	N	N	N	* for post cure oven (for emissions unit P005 and P006 combined) M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005 P006	0.020 lb PE /mmBtu *	17-10 (B)		N	Y	Y	N	N	Y	N	Y	N	N	N	* for pouring with cure oven OR - Must burn only natural gas (an inherently clean fuel for PE) M - Tracking for any day where a fuel other than natural gas was used. ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P004 P005 P006	20 % opacity *	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	* for P005 and P006- for pouring with cure oven only OR - Must burn only natural gas (an inherently clean fuel for PE and opacity) M - Tracking for any day where a fuel other than natural gas was used. ET - None normally required for opacity alone.
P005 P006	None	18-06		Y	N	N	N	N	N	N	N	N	N	N	This operation is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(B).

P005 P006	See comments	23-06 21-08		N	N	N	N	N	N	N	N	N	N	N	The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13782.
P005 P006	None	17-11 (B)  17-07 (A)		Y	N	N	N	N	N	N	N	N	N	N	17-11 Figure II n/a UMRE <10 lb/hr 17-11 Table I n/a PWR = zero  * The burning of natural gas is the only source of PE from pouring with cure oven operations.  17-07 n/a by rule if 17-11 is not applicable
P005 P006	None	21-07 (G)(1)		Y	N	N	N	N	N	N	N	N	N	N	OAC rule 3745-21-07(G)(1) is not applicable to post-cure oven operations since a liquid organic material is not employed.
P005 P006	See comments	17-10 (B)		N	N	N	N	N	N	N	N	N	N	N	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B).
P005 P006	See OR in comments		40 CFR 63. 1290	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - HAP formulation prohibition for cleaning materials, mold release agents M - Material composition tracking. ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C **Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.