



State of Ohio Environmental Protection Agency

Street Address:

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

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

06/11/08

CERTIFIED MAIL

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

05-36-01-0034
Johnson Controls Inc.
Michael G. Meadows
1147 North Washington St.
Greenfield, OH 45123

Dear Michael G. Meadows:

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 Southwest 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 the following address:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
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 Southwest District Office.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Southwest District Office
Indiana
Kentucky



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/11/08	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: 05-36-01-0034 to:
 Johnson Controls Inc.
 1147 North Washington St.
 Greenfield, OH 45123

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

P005 (Foam Line 2) Polyurethane Foam Molding Line.	Polyurethane Foam Molding Line.	Adhesive used to repair defects in parts manufactured on P005 & P007
P007 (Foam Line 1)	P009 (Adhesive Repair L1&2)	

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:

Southwest District Office
 401 East Fifth Street
 Dayton, OH 45402-2911
 (513) 285-6357

Ohio Environmental Protection Agency

Chris Korleski
 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 (i.e., postmarked) 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. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) 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 (i.e., postmarked) 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 deviation reports shall satisfy the requirements 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. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

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 satisfies 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 (for the deviations so reported) the requirements 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:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any 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 (i.e., postmarked) 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. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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 and 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) and OAC rule 3745-77-07(A)(13)(b))

- 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(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 (i.e., postmarked) 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, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). 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 or Emissions Levels

Each IEU 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 from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which 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 Title V permit 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.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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 (i.e., postmarked) 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; or
- 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; or
- 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

None

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 requirements (as defined in OAC rule 37-45-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P010 - vacuum system;
Z007 - tank #7;
Z009 - tank # 9;
Z018 - tank 18, 5,000 gallons;
Z019 - tank 19, 5,000 gallons;
Z020 - tank 20, 3,500 gallons;
Z021 - tank 21, 5,000 gallons;
Z022 - tank 22, 3,500 gallons;
Z023 - tank 23, 5,000 gallons;
Z027 - tank 27, 5,000 gallons;
Z030 - tank 30, 5,000 gallons;
Z031 - tank 31, 6,000 gallons;
Z032 - tank 32, 5,000 gallons;
Z033 - tank 33, 5,000 gallons;
Z034 - tank 34, 6,000 gallons;
Z035 - tank 35, 5,000 gallons;
Z037- Adhesive Repair line;
Z038 - day tank, drum mix tanks;
Z039 - line 1 wax tank;
Z040 - line 2 wax tank;
Z041 - mold cleaning and preparation area; and
Z042 - ink application area.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Foam Line 2 (P005)
Activity Description: Polyurethane Foam Molding Line.

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>
P005 - Polyurethane foam molding line 2 with a fabric filter system	OAC rule 3745-31-05(A)(3) (PTI 05-14129)	<p>Volatile organic compound (VOC) emissions shall not exceed 13.0 pounds per hour (see Section A.I.2.a).</p> <p>Particulate emissions (PE) shall not exceed 0.5 pounds per hour (see Section A.I.2.a) or 1.3 tons per year.</p> <p>Visible PE from the stack shall not exceed 10% opacity, except during clean out</p> <p>During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity.</p> <p>See Section A.I.2.a, and A.II.4.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 41.5 tons as a rolling, 365-day summation.
	OAC rule 3745-17-11(B) and OAC rules 3745-17-07(A)	See Section A.I.2.e.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	see Sections A.II.5, A.II.6., A.II.7, A.III.3, A.III.4, A.III.5, A.IV.3, and A.V.2.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-07(G)(2)	The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day. See sections A.I.2.c, A.II.4, A.III.1., A.IV.1, and A.V.4.

2. Additional Terms and Conditions

- 2.a** The 13.0 lbs VOC per hour and the 0.5 lbs PE per hour limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.
- 2.b** Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of this rule.
- 2.c** On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally-approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G), as specified above, will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to assure compliance with any and all requirements of the revised OAC rule and/or SIP.

- 2.d** The capture VOC emissions from the spray mold release materials employed shall be vented to a thermal incinerator with a minimum destruction efficiency of 90 percent, by weight.
- 2.e** The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Highland County.

This emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The maximum annual spray mold release agent usage for this emissions unit shall not exceed 118.6 tons, based upon a rolling, 365-day summation of the spray mold release usage figures.
2. The maximum annual paste mold release agent usage for this emissions unit shall not exceed 19.5 tons, based upon a rolling, 365-day summation of the spray mold release usage figures.
3. The permittee shall operate a fabric filter system to control PE whenever this emissions unit is in operation.

II. Operational Restrictions (continued)

4. 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).
5. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.
6. The permittee shall install, properly operate, and maintain a direct read air flow balance system that will measure the air flow from the exit vent to mold release application hooding towards the thermal incinerator while the emissions unit is in operation. The air flow balance system shall be maintained in accordance with the manufacturer's recommendations, instructions, operating manual(s), and the work place procedures within this permit and the applicants submitted information. The permittee shall record the air flow in the exit vent at least once each operating day.

The air flow in the exit vent towards the thermal incinerator shall be maintained within the range of 8,310 standard cubic feet per minute (scfm) to 11,244 scfm when ever this emissions unit is in operation.

7. The air flow balance monitoring equipment shall be self-calibrating and equipped with a light alarm system that is set in the operational area for ease of viewing by facility personal.

The light alarm system will be based on a red, yellow, and green standard and indicated any time that the air flow falls below the established range.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - 1.a the company name and identification for each liquid organic material employed; and
 - 1.b documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain daily records of the following information for this emissions unit:
 - 2.a the company name and identification for the spray mold release agent employed;
 - 2.b the VOC content of the spray mold release agent employed, in percent by weight;
 - 2.c the spray mold release agent usage for each day, in pounds;
 - 2.d the rolling, 365-day summation of spray mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);
 - 2.e the company name and identification for the paste mold release agent employed;
 - 2.f the VOC content of the paste mold release agent employed, in % by weight;
 - 2.g the paste mold release agent usage for each day, in pounds;
 - 2.h the rolling, 365-day summation of paste mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);

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

2.i the daily VOC emissions from the use of spray mold release, in pound, i.e., calculated as follows:

$$E_s = (U_s) \times (\text{VOCs}) \times [1 - (\text{CE} \times \text{DE})]$$

where:

E_s = daily VOC emission rate from spray mold release, in pounds per day;

U_s = daily spray mold release usage rate, in pounds, ("c");

VOCs = VOC content of spray mold release, in percent by weight, ("b");

CE = Capture efficiency, as determined during most recent compliance demonstration;

DE = Destruction efficiency, as determined during the most recent compliance demonstration.

2.j the rolling, 365-day summation of VOC emissions from the use spray mold release agent, in tons, (the daily VOC emissions "i" plus the total VOC emissions from the use of spray mold release in the previous 364 days, then divided by 2000 lbs/ton);

2.k the rolling, 365-day summation of VOC emissions from the use spray mold release agent, in tons, (the daily VOC emissions "i" plus the total VOC emissions from the use of spray mold release in the previous 364 days, then divided by 2000 lbs/ton); the daily VOC emissions from the use of paste mold release, in pound, i.e., calculated as follows:

$$E_p = (U_p) \times (\text{VOC}_p)$$

where:

E_p = daily VOC emission rate from spray mold release, in pounds per day;

U_p = daily spray mold release usage rate, in pounds, ("g"); and

VOC_p = VOC content of spray mold release, in percent by weight, ("f").

2.l the rolling, 365-day summation of VOC emissions from the use paste mold release agent, in tons, (the daily VOC emissions "k" plus the total VOC emissions from the use of paste mold release in the previous 364 days, then divided by 2000 lbs/ton);

2.m the total daily VOC emissions from the use of all mold release materials, in pounds per day, (the daily VOC emissions from the use of spray mold release "i" plus the total daily VOC emissions from the use of paste mold release "k", in pounds per day; and

2.n the rolling, 365-day summation of VOC emissions from the use all mold release materials, in tons, (the total daily VOC emissions "m" plus the total VOC emissions from the use of all mold release materials in the previous 364 days, then divided by 2000 lbs/ton).

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

4. The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air flow rate at the thermal incinerator inlet for capture. The combustion temperature indicator range for the thermal incinerator shall be any combustion temperature more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance. The air flow rate at the inlet of the thermal incinerator indicator is identified in section A.II.5 for this emissions unit. The most recent compliance demonstration was used as the basis for developing the combustion temperature and air flow rate indicators. If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
5. The permittee shall measure the air flow velocity at the mold release capture hood with a minimum frequency of once per day while this emissions unit is in operation. The velocity measurement shall be performed in accordance with the procedures outlined in the CAM plan with any changes approved by Ohio EPA, Southwest District Office. Based upon the daily measured velocity, the permittee shall calculate the air flow rate. Units shall be in standard cubic feet per minute. The velocity measuring device shall be capable of accurately measuring the desired parameter. The measuring device shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
6. The permittee shall maintain records that document any time periods when the fabric filters serving as PE controls for this emissions unit were not in service while this emissions unit was operating.
7. This facility shall maintain the following daily records if any material employed is by definition photo chemically reactive material "PRM" or contains a substance that is by definition "PRM", are used in this emissions unit:
 - a. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the amount of each "PRM" material or "PRM" containing material employed, in gallons;
 - b. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound content of each "PRM" material or "PRM" containing material employed, in lbs/gal;
 - c. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound (OC) emissions of each "PRM" material or "PRM" containing material employed, in lbs of OC/day ("a" x "b")
 - d. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the total number of hours this emission unit was operated, in hours/day; and
 - e. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the estimated hourly OC emission rate, in lbs of OC/hr ("f"/"g").

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedance of the rolling, 365-day spray mold release agent usage of 118.6 tons;
 - b. All exceedance of the rolling, 365-day paste mold release agent usage of 19.5 tons; and
 - c. All exceedance of the rolling, 365-day VOC emission limitation of 41.50 tons.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

IV. Reporting Requirements (continued)

- 3.a All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation of more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance;
- 3.b All downtime for the capture (collection) system, control device, monitoring equipment, and air flow balance monitoring equipment when the associated emissions unit was in operation; and
- 3.c The air flow in the exit vent towards the thermal incinerator is not maintained within the range of 8,310 standard cubic feet per minute (scfm) to 11,244 scfm when ever this emissions unit is in operation.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filters serving as PE controls for this emissions unit were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.
- 5. The permittee shall submit deviation (excursion) reports for that identify each exceedance of the following:
 - a. the average hourly OC emissions exceed 8 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials; and/orb.the daily OC emissions exceed 40 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials.

The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I.1. and A.I.2. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

13.0 pounds VOC per hour

The hourly VOC emission limitation was determined as follows:

$$Evoc = (Uspray) \times (VOCs) \times [1 - (CE \times DE)] + (Upaste) \times (VOCp)$$

where:

Evoc = maximum hourly VOC emissions rate, in pounds per hour;
Uspray = maximum hourly spray release agent usage rate, in pounds, (41.7 lbs);
VOCs = VOC content by weight of spray mold release agent (maximum of 96% or 0.96);
(CE x DE)= the capture efficiency multiplied by the destruction efficiency, (BAT for this emissions unit established a combined capture and control efficiency of 80% or 0.80. To determine compliance, the capture and destruction efficiencies as determined during the most recent emission test shall be used.);
Upaste = maximum hourly paste release agent usage rate (5.2 lbs); and
VOCp = VOC content by weight of paste mold release agent (maximum of 96% or 0.96)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission is based on the understanding that the above factors represent the maximum potential operations of this emissions unit.

V. Testing Requirements (continued)

1.b Emission Limitation:

41.50 tons VOC as a rolling, 365-day summation

Applicable Compliance Method:

Compliance with the rolling, 365-day VOC emissions limitation shall be determined through the record keeping requirements established in Part III - Section A.III.2., of this permit.

1.c Emission Limitation:

0.5 pounds PE per hour and 1.3 tons PE per year

The hourly PE limitation was established as follows:

$$E_{pe} = (U_{spray}) \times (S) \times [1 - (CE \times RE)]$$

E_{pe} = maximum hourly PE rate

U_{spray} = maximum hourly spray release agent usage rate (41.7 lbs)

S = solid content of spray mold release agent (maximum of 5% or 0.05)

CE = capture efficiency (100% for solids)

RE = removal efficiency (78% for fabric filters)

Applicable Compliance Method:

The annual PE limitations was established by the above equation except the maximum hourly spray is replaced by the maximum annual spray of 118.6 tons.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.d Visible Emission Limitation:

0% opacity from the stack

During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.e Emission Limitation:

The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum control (destruction) efficiency of 90%, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control efficiency requirement above shall be demonstrated based on the results of emission tests conducted in accordance with the procedures as outlined in section A.V., of this permit.

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

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

V. Testing Requirements (continued)

- 2.a** The emission testing shall be conducted within 1 year prior to the expiration of this permit, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office;
- 2.b** The emission testing shall be conducted to demonstrate compliance with the following: the hourly VOC emission limitation and overall control efficiency requirements (both capture and control) for this emissions unit;
- 2.c** The emission testing shall be conducted to demonstrate that the CAM requirements as outlined in Section A.II.5, A.II.6, and A.II.7;
- 2.d** The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):
- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- 2.e** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.
- 3.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

V. Testing Requirements (continued)

4. Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.

Applicable Compliance Method:

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section III.7.

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>
P005 - Polyurethane foam molding line 2 with a fabric filter system	OAC rule 3745-114-01	Ohio Toxic Policy
	OAC rules 3745-17-11(C)	See Sections B.II.1, B.III.4., B.III.5., and B.IV.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- This emissions unit shall be controlled by a dry particulate filter system. The dry particulate filter system shall be operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall perform any needed maintenance and repair for the filter system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units P005 and P007 were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Naptha (64742-47-8)
 TLV (ug/m3): 200,000
 Maximum Hourly Emission Rate (lbs/hr): 13.0
 1-Hour Maximu Ground-Level Concentration (ug/m3): 2.053
 MAGLC (ug/m3): 4.761

Pollutant: Diethanol-amine (111-42-2)
 TLV (ug/m3): 2,000
 Maximum Hourly Emission Rate (lbs/hr): 0.0001319
 1-Hour Maximu Ground-Level Concentration (ug/m3): 0.0106
 MAGLC (ug/m3): 47.6

Pollutant: 1,4-TDI (584-84-9)
 TLV (ug/m3): 35.6
 Maximum Hourly Emission Rate (lbs/hr): 0.00583
 1-Hour Maximu Ground-Level Concentration (ug/m3): 0.469
 MAGLC (ug/m3): 0.848

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - 2.a changes in the composition of the materials used (typically for coatings or cleanup materials), 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;
 - 2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - 2.c physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - 3.a a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - 3.b documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 3.c where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
4. The owner or operator shall conduct periodic inspections at a frequency that is based upon the recommendation of the manufacturer of the panel filter system, or at least once each calendar year, whichever ever is comes first. The inspection shall determine whether the filter system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the panel filter system with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.

The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

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

5. In the event that the dry filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

IV. Reporting Requirements

1. The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Foam Line 1 (P007)
Activity Description: Polyurethane Foam Molding Line.

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>
P007 - Polyurethane foam molding line 1 with a fabric filter system	OAC rule 3745-31-05(A)(3) (PTI 05-14129)	<p>Volatile organic compound (VOC) emissions shall not exceed 17.0 pounds per hour (see Section A.I.2.a).</p> <p>Particulate emissions (PE) shall not exceed 0.5 pounds per hour (see Section A.I.2.a) or 1.3 tons per year.</p> <p>Visible PE from the stack shall not exceed 10% opacity, except during clean out</p> <p>During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity.</p> <p>See Section A.I.2.a, and A.II.4.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 52.88 tons as a rolling, 365-day summation.
	OAC rule 3745-17-11(B) and OAC rules 3745-17-07(A)	See Section A.I.2.e.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	see Sections A.II.5, A.II.6., A.II.7, A.III.3, A.III.4, A.III.5, A.IV.3, and A.V.2.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-07(G)(2)	The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day. See sections A.I.2.c, A.II.4, A.III.1., A.IV.1, and A.V.4.

2. Additional Terms and Conditions

- 2.a** The 17.0 lbs VOC per hour and the 0.5 lbs PE per hour limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.
- 2.b** Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of this rule.
- 2.c** On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally-approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G), as specified above, will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to assure compliance with any and all requirements of the revised OAC rule and/or SIP.

- 2.d** The capture VOC emissions from the spray mold release materials employed shall be vented to a thermal incinerator with a minimum destruction efficiency of 90 percent, by weight.
- 2.e** The uncontrolled mass rate of particulate emissions (UMRE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Highland County.

This emissions unit is also exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The maximum annual spray mold release agent usage for this emissions unit shall not exceed 118.6 tons, based upon a rolling, 365-day summation of the spray mold release usage figures.
2. The maximum annual paste mold release agent usage for this emissions unit shall not exceed 19.5 tons, based upon a rolling, 365-day summation of the spray mold release usage figures.
3. The permittee shall operate a fabric filter system to control PE whenever this emissions unit is in operation.

II. Operational Restrictions (continued)

4. 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).
5. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.
6. The permittee shall install, properly operate, and maintain a direct read air flow balance system that will measure the air flow from the exit vent to mold release application hooding towards the thermal incinerator while the emissions unit is in operation. The air flow balance system shall be maintained in accordance with the manufacturer's recommendations, instructions, operating manual(s), and the work place procedures within this permit and the applicants submitted information. The permittee shall record the air flow in the exit vent at least once each operating day.

The air flow in the exit vent towards the thermal incinerator shall be maintained within the range of 8,690 standard cubic feet per minute (scfm) to 11,758 scfm when ever this emissions unit is in operation.

7. The air flow balance monitoring equipment shall be self-calibrating and equipped with a light alarm system that is set in the operational area for ease of viewing by facility personal.

The light alarm system will be based on a red, yellow, and green standard and indicated any time that the air flow falls below the established range.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - 1.a the company name and identification for each liquid organic material employed; and
 - 1.b documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain daily records of the following information for this emissions unit:
 - 2.a the company name and identification for the spray mold release agent employed;
 - 2.b the VOC content of the spray mold release agent employed, in percent by weight;
 - 2.c the spray mold release agent usage for each day, in pounds;
 - 2.d the rolling, 365-day summation of spray mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);
 - 2.e the company name and identification for the paste mold release agent employed;
 - 2.f the VOC content of the paste mold release agent employed, in % by weight;
 - 2.g the paste mold release agent usage for each day, in pounds;
 - 2.h the rolling, 365-day summation of paste mold release agent usage, in tons (i.e., to convert pounds to tons divide by 2000 lbs/ton);

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

- 2.i** the daily VOC emissions from the use of spray mold release, in pound, i.e., calculated as follows:

$$E_s = (U_s) \times (\text{VOCs}) \times [1 - (\text{CE} \times \text{DE})]$$

where:

E_s = daily VOC emission rate from spray mold release, in pounds per day;

U_s = daily spray mold release usage rate, in pounds, ("c");

VOCs = VOC content of spray mold release, in percent by weight, ("b");

CE = Capture efficiency, as determined during most recent compliance demonstration;

DE = Destruction efficiency, as determined during the most recent compliance demonstration.

- 2.j** the rolling, 365-day summation of VOC emissions from the use spray mold release agent, in tons, (the daily VOC emissions "i" plus the total VOC emissions from the use of spray mold release in the previous 364 days, then divided by 2000 lbs/ton);
- 2.k** the rolling, 365-day summation of VOC emissions from the use spray mold release agent, in tons, (the daily VOC emissions "i" plus the total VOC emissions from the use of spray mold release in the previous 364 days, then divided by 2000 lbs/ton); the daily VOC emissions from the use of paste mold release, in pound, i.e., calculated as follows:

$$E_p = (U_p) \times (\text{VOC}_p)$$

where:

E_p = daily VOC emission rate from spray mold release, in pounds per day;

U_p = daily spray mold release usage rate, in pounds, ("g"); and

VOC_p = VOC content of spray mold release, in percent by weight, ("f").

- 2.l** the rolling, 365-day summation of VOC emissions from the use paste mold release agent, in tons, (the daily VOC emissions "k" plus the total VOC emissions from the use of paste mold release in the previous 364 days, then divided by 2000 lbs/ton);
- 2.m** the total daily VOC emissions from the use of all mold release materials, in pounds per day, (the daily VOC emissions from the use of spray mold release "i" plus the total daily VOC emissions from the use of paste mold release "k", in pounds per day; and
- 2.n** the rolling, 365-day summation of VOC emissions from the use all mold release materials, in tons, (the total daily VOC emissions "m" plus the total VOC emissions from the use of all mold release materials in the previous 364 days, then divided by 2000 lbs/ton).
- 3.** The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

4. The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air flow rate at the thermal incinerator inlet for capture. The combustion temperature indicator range for the thermal incinerator shall be any combustion temperature more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance. The air flow rate at the inlet of the thermal incinerator indicator is identified in section A.II.5 for this emissions unit. The most recent compliance demonstration was used as the basis for developing the combustion temperature and air flow rate indicators. If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
5. The permittee shall measure the air flow velocity at the mold release capture hood with a minimum frequency of once per day while this emissions unit is in operation. The velocity measurement shall be performed in accordance with the procedures outlined in the CAM plan with any changes approved by Ohio EPA, Southwest District Office. Based upon the daily measured velocity, the permittee shall calculate the air flow rate. Units shall be in standard cubic feet per minute. The velocity measuring device shall be capable of accurately measuring the desired parameter. The measuring device shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
6. The permittee shall maintain records that document any time periods when the fabric filters serving as PE controls for this emissions unit were not in service while this emissions unit was operating.
7. This facility shall maintain the following daily records if any material employed is by definition photo chemically reactive material "PRM" or contains a substance that is by definition "PRM", are used in this emissions unit:
 - a. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the amount of each "PRM" material or "PRM" containing material employed, in gallons;
 - b. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound content of each "PRM" material or "PRM" containing material employed, in lbs/gal;
 - c. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound (OC) emissions of each "PRM" material or "PRM" containing material employed, in lbs of OC/day ("a" x "b")
 - d. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the total number of hours this emission unit was operated, in hours/day; and
 - e. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the estimated hourly OC emission rate, in lbs of OC/hr ("f"/"g").

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedance of the rolling, 365-day spray mold release agent usage of 118.6 tons;
 - b. All exceedance of the rolling, 365-day paste mold release agent usage of 19.5 tons; and
 - c. All exceedance of the rolling, 365-day VOC emission limitation of 52.88 tons.
3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

IV. Reporting Requirements (continued)

- 3.a All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation of more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance;
- 3.b All downtime for the capture (collection) system, control device, monitoring equipment, and air flow balance monitoring equipment when the associated emissions unit was in operation; and
- 3.c The air flow in the exit vent towards the thermal incinerator is not maintained within the range of 8,690 standard cubic feet per minute (scfm) to 11,758 scfm when ever this emissions unit is in operation.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

- 4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filters serving as PE controls for this emissions unit were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.
- 5. The permittee shall submit deviation (excursion) reports for that identify each exceedance of the following:
 - a. the average hourly OC emissions exceed 8 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials; and/orb.the daily OC emissions exceed 40 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials.

The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I.1. and A.I.2. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

17.0 pounds VOC per hour

The hourly VOC emission limitation was determined as follows:

$$E_{voc} = (U_{spray}) \times (VOCs) \times [1 - (CE \times DE)] + (U_{paste}) \times (VOCp)$$

where:

E_{voc} = maximum hourly VOC emissions rate, in pounds per hour;
 U_{spray} = maximum hourly spray release agent usage rate, in pounds, (41.7 lbs);
 $VOCs$ = VOC content by weight of spray mold release agent (maximum of 96% or 0.96);
 $(CE \times DE)$ = the capture efficiency multiplied by the destruction efficiency, (BAT for this emissions unit established a combined capture and control efficiency of 70% or 0.70. To determine compliance, the capture and destruction efficiencies as determined during the most recent emission test shall be used.);
 U_{paste} = maximum hourly paste release agent usage rate (5.2 lbs); and
 $VOCp$ = VOC content by weight of paste mold release agent (maximum of 96% or 0.96)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission is based on the understanding that the above factors represent the maximum potential operations of this emissions unit.

V. Testing Requirements (continued)

1.b Emission Limitation:

52.88 tons VOC as a rolling, 365-day summation

Applicable Compliance Method:

Compliance with the rolling, 365-day VOC emissions limitation shall be determined through the record keeping requirements established in Part III - Section A.III.2., of this permit.

1.c Emission Limitation:

0.5 pounds PE per hour and 1.3 tons PE per year

The hourly PE limitation was established as follows:

$$E_{pe} = (U_{spray}) \times (S) \times [1 - (CE \times RE)]$$

E_{pe} = maximum hourly PE rate

U_{spray} = maximum hourly spray release agent usage rate (41.7 lbs)

S = solid content of spray mold release agent (maximum of 5% or 0.05)

CE = capture efficiency (100% for solids)

RE = removal efficiency (78% for fabric filters)

Applicable Compliance Method:

The annual PE limitations was established by the above equation except the maximum hourly spray is replaced by the maximum annual spray of 118.6 tons.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.d Visible Emission Limitation:

0% opacity from the stack

During clean out, the opacity may not exceed 20% opacity except for one six minute period in any one hour where the opacity may not exceed 60% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.e Emission Limitation:

The VOC emissions from the spray mold release agents for this emissions unit shall be vented to a thermal incinerator with a minimum control (destruction) efficiency of 90%, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control efficiency requirement above shall be demonstrated based on the results of emission tests conducted in accordance with the procedures as outlined in section A.V., of this permit.

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

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

V. Testing Requirements (continued)

- 2.a** The emission testing shall be conducted within 1 year prior to the expiration of this permit, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office;
- 2.b** The emission testing shall be conducted to demonstrate compliance with the following: the hourly VOC emission limitation and overall control efficiency requirements (both capture and control) for this emissions unit;
- 2.c** The emission testing shall be conducted to demonstrate that the CAM requirements as outlined in Section A.II.5, A.II.6, and A.II.7;
- 2.d** The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):
- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- 2.e** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.
- 3.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

V. Testing Requirements (continued)

4. Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.

Applicable Compliance Method:

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section III.7.

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>
P005 - Polyurethane foam molding line 2 with a fabric filter system	OAC rule 3745-114-01 OAC rules 3745-17-11(C)	Ohio Toxic Policy See Sections B.II.1, B.III.4., B.III.5., and B.IV.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- This emissions unit shall be controlled by a dry particulate filter system. The dry particulate filter system shall be operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall perform any needed maintenance and repair for the filter system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units P005 and P007 were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Naptha (64742-47-8)
 TLV (ug/m3): 200,000
 Maximum Hourly Emission Rate (lbs/hr): 13.0
 1-Hour Maximu Ground-Level Concentration (ug/m3): 2.053
 MAGLC (ug/m3): 4.761

Pollutant: Diethanol-amine (111-42-2)
 TLV (ug/m3): 2,000
 Maximum Hourly Emission Rate (lbs/hr): 0.0001319
 1-Hour Maximu Ground-Level Concentration (ug/m3): 0.0106
 MAGLC (ug/m3): 47.6

Pollutant: 1,4-TDI (584-84-9)
 TLV (ug/m3): 35.6
 Maximum Hourly Emission Rate (lbs/hr): 0.00583
 1-Hour Maximu Ground-Level Concentration (ug/m3): 0.469
 MAGLC (ug/m3): 0.848

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - 2.a changes in the composition of the materials used (typically for coatings or cleanup materials), 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;
 - 2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - 2.c physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - 3.a a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - 3.b documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 3.c where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
4. The owner or operator shall conduct periodic inspections at a frequency that is based upon the recommendation of the manufacturer of the panel filter system, or at least once each calendar year, whichever ever is comes first. The inspection shall determine whether the filter system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the panel filter system with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.

The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

Facility Name: **Johnson Controls Inc.**

Facility ID: **05-36-01-0034**

Emissions Unit: **Foam Line 1 (P007)**

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

5. In the event that the dry filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

These documents shall be maintained for not less than five years and made available to Ohio EPA upon request.

IV. Reporting Requirements

1. The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive Repair L1&2 (P009)

Activity Description: Adhesive used to repair defects in parts manufactured on P005 & P007

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 seating repair line	OAC rule 3745-31-05(A)(3) and PTI 05-08336	VOC Emissions shall not exceed 115 lbs/day and 63.84 lbs/day per rolling 365-day period. The use of non-photchemically reactive materials. See sections A.I.2.a, A.II.2, A.III.2., A.IV.1, and A.V.3.
	OAC rule 3745-21-07(G)	The limitations and requirements of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3). See sections A.I.2.a

2. Additional Terms and Conditions

- The prohibition of the use of photochemically reactive material reflects a requirement established to exempt this emissions unit from the current Ohio SIP approved by the U.S. EPA. Ohio has requested that this part of the the SIP be modified to no longer have applicable limits for emissions units like this one, but the new requirements will not become federally enforceable until it is approved by the U.S. EPA as a revision to the Ohio SIP for organic compound emissions. When approved by the U.S. EPA, the prohibition of the use of photochemically reactive materials and OAC rule 3745-21-07(G)(2) shall no longer apply.

II. Operational Restrictions

- The maximum organic compound usage in this emissions unit shall not exceed 115 pounds per day, nor 63.84 pounds per day, as based on a rolling 365-day average.
- The materials employed in this emissions unit shall be limited to only of non-photchemically reactive materials.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the following information for each day for the materials employed in this emissions unit:

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

- 1.a the company identification of each material employed;
- 1.b the amount of each material employed;
- 1.c the organic compound (OC) content of each material employed, in percent by weight;
- 1.d the calculated organic compound emissions, in pounds per day (the sum of "b" x "c" for all OC emitting materials employed); and
- 1.e the average rolling, 365-daily combined total amount of OC materials employed in this emissions unit, in pounds employed. The rolling, 365-daily average summation shall be based on the combined total amount of OC materials employed during the previous 365 day period divided by 365.
- 2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - 2.a the company name and identification for each liquid organic material employed; and
 - 2.b documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

- 1. The permittee shall notify the Director of any daily record showing the use of photochemically reactive materials. A copy of such record shall be sent to the Director within 30 days following the use of photochemically reactive materials.
- 2. The permittee shall notify the Director of any daily record showing an exceedance of either:
 - 2.a the maximum 115 pounds of OC single day emission limitation; and/or
 - 2.b the 63.84 pounds of OC per rolling 365-day rolling average.

A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
- 3. The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

- 1. Compliance with the emission limitations in Section A..I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
115 pounds OC per daily,

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections A.III.1.d. of these T&C's.
 - 1.b Emission Limitation:
63.84 pounds OC per daily, based on a rolling 365-day rolling average

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections A.III.1.e. of these T&C's.

V. Testing Requirements (continued)

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents materials employed.
3. Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.

Applicable Compliance Method:

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section III.1.

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

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Johnson Controls, Inc.
Premise Number	0536010034
What makes this facility a Title V facility?	VOC
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)	Since the issuance of the initial Title V, there was been two PTI's issued, 05-14129, issued on Oct. 6, 2005, and 05-12749, issued final on Oct. 21, 2004. Both appeared to address changes in the record keeping and reporting requirements for emissions units P005 and P007.
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		Comments
	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												
P005	12.1 lbs VOC/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install. M - no monitoring required based on PTE R - none necessary since limit is PTE Rp - none necessary since limit is PTE
P005	0.5 lbs PE/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install. M - no monitoring required based on PTE R - none necessary since limit is PTE Rp - none necessary since limit is PTE

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P005	1.3 tons PE/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install. ET - limit based on material usage mass balance
P005	10% opacity except during cleanout when 20% opacity	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install ET - none required for visible emissions
P005	no photocemically reactive material	21-07(G)(2)	N	Y	Y	Y	N	N	Y	N	Y	N	Y	N	ND - maintain records of type of liquid organic material employed and whether or not PRM.
P005	32.7 tons VOC per rolling, 12-month sum	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(C), all requirements have been transferred from the permit to install ET - limit based on material usage and mass balance
P005	RTO combustion temp	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis for restriction is OAC rule 3745-31-05(A), and CAM. CAM indicator requirement is based upon most recent compliance demonstration figures.
P005	Spray material usage limit	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for restriction is OAC rule 3745-31-05(A) and 3745-31-05(C) ET - not required for usage limit
P005	Paste material usage limit	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for restriction is OAC rule 3745-31-05(A) and 3745-31-05(C) ET - not required for usage limit
P005	Minimum air flow requirement to ensure capture	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis for restriction is OAC rule 3745-31-05(A), and CAM. CAM indicator requirement is based upon most recent compliance demonstration figures.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P007	16.1 lbs VOC/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install. M - no monitoring required based on PTE R - none necessary since limit is PTE Rp - none necessary since limit is PTE
P007	0.5 lbs PE/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install. M - no monitoring required based on PTE R - none necessary since limit is PTE Rp - none necessary since limit is PTE
P007	1.3 tons PE/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install. ET - limit based on material usage mass balance
P007	10% opacity except during cleanout when 20% opacity	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(A), all requirements have been transferred from the permit to install ET - none required for visible emissions
P007	no photochemica lly reactive material	21- 07(G)(2)	N	Y	Y	Y	N	N	Y	N	Y	N	Y	N	ND - maintain records of type of liquid organic material employed and whether or not PRM.
P007	43.97 tons VOC per rolling, 12- month sum	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(C), all requirements have been transferred from the permit to install ET - limit based on material usage and mass balance
P007	RTO combustion temp	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis for restriction is OAC rule 3745-31-05(A), and CAM. CAM indicator requirement is based upon most recent compliance demonstration figures.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P007	Spray material usage limit	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for restriction is OAC rule 3745-31-05(A) and 3745-31-05(C) ET - not required for usage limit
P007	Paste material usage limit	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis for restriction is OAC rule 3745-31-05(A) and 3745-31-05(C) ET - not required for usage limit
P007	Minimum air flow requirement to ensure capture	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis for restriction is OAC rule 3745-31-05(A), and CAM. CAM indicator requirement is based upon most recent compliance demonstration figures.
P009	115 lbs OC per day	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Basis for limit is OAC rule 3745-31-05(C), all requirements have been transferred from the permit to install ET - limit based on material usage and mass balance
P009	63.84 pounds per rolling, 365-day average	N	Y	N	N	Y	N	N	Y	N	Y	Y	N	N	Basis for limit is OAC rule 3745-31-05(C), all requirements have been transferred from the permit to install ET - limit based on material usage and mass balance
P009	no photochemically reactive material	21-07(G)(2)	N	Y	Y	Y	N	N	Y	N	Y	N	Y	N	ND - maintain records of type of liquid organic material employed and whether or not PRM.

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.

C **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.