



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

07/30/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

05-75-01-0146
Norcold
Ann Schemmel
600 South Kuther Road
Sidney, OH 45365

Dear Ann Schemmel:

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.

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 or comments concerning this draft Title V permit, please contact Southwest District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Southwest District Office
Indiana



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 07/30/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Norcold
600 South Kuther Road
Sidney, OH 45365

of a Title V permit for Facility ID: 05-75-01-0146

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

P007 (NA2 Polyurethane Foaming Operation)

Emissions from polyurethane foaming operation

P008 (Dual Electric Polyurethane Foaming Operation)

Emissions from polyurethane foaming operation.

P009 (Door Polyurethane Foaming Operation)

Emissions from polyurethane foaming operation.

P010 (System Polyurethane Operation)

Emissions from polyurethane foaming operation.

P011 (Cabinet Polyurethane Foaming Operation)

Emissions from polyurethane foaming operation.

P012 (R&D Polyurethane Operation)

Emissions from polyurethane foaming operation.

P013 (Test Polyurethane Operation)

Emissions from polyurethane foaming operation.

P014 (T-12 Polyurethane Operation)

Emissions from polyurethane foaming operation.

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 3745-77-04(A) 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

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting

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

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and 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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility.

Z001-Inline #1 Plastic Vacuum Former
Z002-Inline #2 Plastic Vacuum Former
Z003-Inline #3 Plastic Vacuum Former
Z004-Blue Rotary (Plastic Vacuum Former)
Z005-Brown Rotary (Plastic Vacuum Former)
Z006-FIN Machine
Z007-Bulk Propane Tank
Z008-Parts Cleaner
Z009-Tank A1
Z010-Tank A2
Z011-Tank A3
Z012-Tank A4
Z013-Tank A5
Z014-Tank B1
Z015-Tank B2
Z016-Tank B3
Z017-Tank B4
Z018-Tank B5
Z019-Air Make-Up Unit

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitation and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: NA2 Polyurethane Foaming Operation (P007)
Activity Description: Emissions from polyurethane foaming operation

A. State and Federally 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>
NA2 foaming operation	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

1.a Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.c Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.d Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
NA2 foaming operation	OAC rule 3745-31-05 PTI # 05-9501	249.75 lbs/day and 45.6 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a The 249.75 lbs/day and 45.6 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
249.75 lbs/day OC, 45.6 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (1,350 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation is assumed as long as compliance with the daily limitation is maintained (the annual emission limitation is based upon multiplying the daily limitation by 365 and dividing by 2000).

1.b Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

1.c Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dual Electric Polyurethane Foaming Operation (P008)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
dual electric foaming process	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

1.a Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.c Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.d Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
dual electric foaming process	OAC rule 3745-31-05 PTI # 05-9501	311.7 lbs/day and 56.9 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a The 311.7 lbs/day and 56.9 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
311.7 lbs/day OC, 56.9 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (1684.8 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation is assumed as long as compliance with the daily limitation is maintained (the annual emission limitation is based upon multiplying the daily limitation by 365 and dividing by 2000).

1.b Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

1.c Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Door Polyurethane Foaming Operation (P009)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
door foaming process	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

1.a Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.c Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.d Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
door foaming process	OAC rule 3745-31-05 PTI # 05-9501	387.2 lbs/day and 70.7 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a** The 387.2 lbs/day and 70.7 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b** The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

- This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
387.2 lbs/day OC, 70.7 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (2092.8 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation is assumed as long as compliance with the daily limitation is maintained (the annual emission limitation is based upon multiplying the daily limitation by 365 and dividing by 2000).

1.b Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

1.c Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: System Polyurethane Operation (P010)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
system foaming process	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.b** Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.c** Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.d** Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
system foaming process	OAC rule 3745-31-05 PTI # 05-9501	152.7 lbs/day and 27.9 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a The 152.7 lbs/day and 27.9 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
152.7 lbs/day OC, 27.9 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (825.6 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation is assumed as long as compliance with the daily limitation is maintained (the annual emission limitation is based upon multiplying the daily limitation by 365 and dividing by 2000).

- 1.b** Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

- 1.c** Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Cabinet Polyurethane Foaming Operation (P011)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
cabinet foaming process	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.b** Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.c** Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.d** Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
cabinet foaming process	OAC rule 3745-31-05 PTI # 05-9501	821.8 lbs/day and 150 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a The 821.8 lbs/day and 150 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:
821.8 lbs/day OC, 150 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (4442.4 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation is assumed as long as compliance with the daily limitation is maintained (the annual emission limitation is based upon multiplying the daily limitation by 365 and dividing by 2000).

1.b Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

1.c Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: R&D Polyurethane Operation (P012)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
R & D foaming process	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

1.a Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.c Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.d Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
R & D foaming process	OAC rule 3745-31-05 PTI # 05-9501	192.9 lbs/day and 1.2 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a** The 192.9 lbs/day OC emission limitation is established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

- This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall annually maintain and record the total OC emissions (the annual OC emissions shall be calculated by summing the monthly OC emissions from section A.III.1.g for the calendar year), in tons, for this emissions unit.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
192.9 lbs/day OC, 1.2 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (1042.7 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation shall be based upon the record keeping required in section B.III of this permit.

- 1.b** Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

- 1.c** Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Test Polyurethane Operation (P013)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
test foaming operation	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.b** Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.c** Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 1.d** Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
test foaming operation	OAC rule 3745-31-05 PTI # 05-9501	17.8 lbs/day and 0.11 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- The 17.8 lbs/day OC emission limitation is established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

- This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall annually maintain and record the total OC emissions (the annual OC emissions shall be calculated by summing the monthly OC emissions from section A.III.1.g for the calendar year), in tons, for this emissions unit.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
17.8 lbs/day OC, 0.11 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (96.2 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation shall be based upon the record keeping required in section B.III of this permit.

- 1.b** Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

- 1.c** Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: T-12 Polyurethane Operation (P014)
Activity Description: Emissions from polyurethane foaming operation.

A. State and Federally 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>
T-12 foaming operation	OAC rule 3745-21-07(G)	Refer to section A.II.1 of this permit.
	OAC rule 3745-31-05(D) PTI # 05-9501	Refer to section A.I.2 of this permit.

2. Additional Terms and Conditions

- 2.a The organic compound (OC) emissions from emissions units P007-P015 combined shall not exceed 168.3 tons/rolling, 12-month period.
- 2.b The OC content of the resin materials employed in this emissions unit shall not exceed 18.5% by weight.
- 2.c The maximum resin material usage for emissions units P007-P015 combined shall not exceed 909.73 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall not exceed the resin material usages specified in the following table (for emissions units P007-P015 combined):

Total Allowable, Resin Material Usage	
Month(s)	Tons
1	75.82
1-2	151.63
1-3	227.44
1-4	303.25
1-5	379.06
1-6	454.87
1-7	530.68
1-8	606.49
1-9	682.30
1-10	758.11
1-11	833.92
1-12	909.73

After the first 12 calendar months of operation following the issuance of PTI # 05-9501, compliance with the annual usage restriction for the resin materials shall be based upon a rolling, 12-month summation of the monthly resin material usages.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P007-P015 combined:
 - 1.a the company identification of each resin material employed;
 - 1.b documentation on whether or not each resin material employed is a photochemically reactive material;
 - 1.c the amount of each resin material employed, in pounds;
 - 1.d the amount of all resin materials employed, in tons;
 - 1.e the OC content of each resin material employed, in percent by weight;
 - 1.f the total OC emission rate, in pounds, for each resin material employed;
 - 1.g the total OC emission rate, in pounds, for all resin materials employed;
 - 1.h beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the OC emissions for all the resin materials employed, in tons;
 - 1.i beginning after the first 12 calendar months of operation following the issuance of PTI # 05-9501, the rolling, 12-month summation of the amount of all resin materials employed, in tons; and
 - 1.j during the first 12 calendar months of operation following the issuance of PTI # 05-9501, the permittee shall record the cumulative resin material usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit annual reports which summarize the actual annual OC emissions and resin material usage for this emissions unit. These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - 2.a an identification of each month during which any photochemically reactive material was employed;
 - 2.b an identification of each month during which the OC content of any of the resin materials employed exceeded the limitation of 18.5% by weight; and
 - 2.c an identification of all exceedances of the rolling, 12-month OC emission limitation of 168.3 tons.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month resin material usage restriction of 909.73 tons, and for the first 12 calendar months of operation following the issuance of PTI # 05-9501, all exceedances of the maximum allowable cumulative resin material usage restrictions.

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:

V. Testing Requirements (continued)

1.a Emission Limitation:
18.5% (by weight) OC content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.b Emission Limitation:
168.3 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.c Emission Limitation:
909.73 tons/rolling, 12-month period (resin material usage)

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

1.d Emission Limitation:
the monthly cumulative resin material usage restriction

Applicable Compliance Method:

Compliance shall be based upon the record keeping required in Section A.III of the terms and conditions of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the resin materials.

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>
T-12 foaming operation	OAC rule 3745-31-05 PTI # 05-9501	372.1 lbs/day and 67.9 TPY OC (from resin material usage) 10 lbs/year OC (from isocyanate material usage) The OC content of the isocyanate materials shall not exceed 0.00012% by weight.

2. Additional Terms and Conditions

- 2.a The 372.1 lbs/day and 67.9 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b The OC content of 0.00012% (by weight) and the 10 lbs OC/year emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, it isn't necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. This permit allows the use of materials (coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: chlorodifluoromethane (R-22)

TLV (ug/m3): 3,540,000

Maximum Hourly Emission Rate (lbs/hr): 332.2*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 11,380

MAGLC (ug/m3): 84,286

* This represents the maximum emission rate for emissions units P007-P015 combined (contained in PTI # 05-9501).

II. Operational Restrictions (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process that may be determined to be a "modification":
 - 2.a changes in the composition of the materials used (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 specified in the above table;
 - 2.b changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - 2.c changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - 2.d changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - 3.a the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - 3.b the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - 3.c prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - 1.a background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - 1.b a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
372.1 lbs/day OC, 67.9 TPY OC

Applicable Compliance Method-

Compliance with the daily OC emission limitation shall be based upon multiplying the maximum daily resin material usage (2011.2 lbs) by the maximum OC content of all the resin materials (18.5% by weight).

Compliance with the annual OC emission limitation is assumed as long as compliance with the daily limitation is maintained (the annual emission limitation is based upon multiplying the daily limitation by 365 and dividing by 2000).

- 1.b** Emission limitation:
10 lbs/year OC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum annual isocyanate material usage (8,334,000 lbs) by the maximum OC content of all the isocyanate materials (0.00012% by weight).

- 1.c** Emission limitation:
0.00012% (by weight) OC content

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of all the materials.

VI. Miscellaneous Requirements

None

Facility Name: **Norcold**
Facility ID: **05-75-01-0146**

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