State of Ohio Environmental Protection Agency

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

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

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

10/24/01

CERTIFIED MAIL

RE: Preliminary Proposed Title V
Chapter 3745-77 permit

03-26-00-0160
Archbold Container Corporation
Lynn Aschliman
800 West Barre Road
PO Box 10
Archbold, OH 43502

Dear Lynn Aschliman:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/06/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 10/24/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-26-00-0160 to:

Archbold Container Corporation
800 West Barre Road
ARCHBOLD, OH 43502

Emissions Unit ID (Company ID)/Emissions Unit Activity Description		
P701 (ACC EPS LINE, MOLDING, STORAGE, CUTTING OPERATIONS) ARCHBOLD CONTAINER PLANT AREA J		

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:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> 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.

18. Insignificant Activity

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

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:

Z700 - ACC labelers; Z701 - ACC flexo-diecutters; Z702 - ACC corrugated recycling system; Z703 - AC 949124 air makeup unit; Z704 - AC 949125 air makeup unit; and Z705 - AC 160555 air makeup unit.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: ACC EPS LINE, MOLDING, STORAGE, CUTTING OPERATIONS (P701)

Activity Description: ARCHBOLD CONTAINER PLANT AREA J

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
expandable polystyrene (EPS) line consisting of hopper, pre-expander, pneumatic transfer, curing, block molder, (2) shape molders, mold cutting and storage	OAC rule 3745-31-05(A)(3) (PTI #03-13574)	2.53 lbs of volatile organic compounds (VOC)/hr (total for all stack emissions) The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See A.I.2.a.
	OAC rule 3745-31-05(D) PTI #03-13574	255.22 tons VOC/rolling, 12-month period (for stack and fugitive emissions, combined) (See A.I.2.b.)
	OAC rule 3745-17-11(B)	none (See A.I.2.d.)
	OAC rule 3745-17-07(A)	none (See A.I.2.e.)
	OAC rule 3745-21-07(G)	none (See A.I.2.c.)

2. Additional Terms and Conditions

2.a Best available technology (BAT) requirements have been determined to be consistent with the best available control technology (BACT) requirements of PTI #03-13574. BACT (for controlling the VOC emissions) for this emissions unit was determined to be the use of a control system meeting the following requirements :

i. The control system shall include a collection system for the hopper, pre-expander, pneumatic transfer, curing, block molder, and 2 shape molders. The collection system shall achieve a capture efficiency of at least 70%, by weight, for VOCs. (The BACT analysis for the EPS line showed that it was not cost-effective to capture and control emissions from the mold cutting and storage operations.)

ii. The control system also shall include a regenerative thermal oxidizer with a destruction efficiency of at least 99%, by weight, for VOCs.

iii. The VOC emissions (for the stack and fugitive emissions, combined) shall be not exceed 1.64 lbs VOC/100 lbs of EPS beads processed.

2. Additional Terms and Conditions (continued)

2.b The permittee has requested a federally enforceable limitation of 255.30 tons of VOC per rolling, 12-month period (based on the pentane content of the EPS beads and on the usage restriction for the EPS beads) for the purpose of avoiding PSD review (see Sections A.II.2 & A.II.3).

2.c This emissions unit is not subject to OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), enters this emissions unit as a separate raw material.

2.d The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Table I does not apply because the facility is located in Crawford County.

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

II. Operational Restrictions

1. The permittee shall only employ EPS thermoplastic polymer/co-polymer in this emissions unit with pentane as the sole blowing agent.

2. The VOC content of the raw EPS thermoplastic polymer/co-polymer beads used in this emissions unit is pentane and shall not exceed 6.5%, by weight. The VOC content of the final EPS products also is pentane and shall be no less than 1.8 percent, by weight.

3. The maximum raw EPS beads throughput shall not exceed 8,200 lbs/hr (as a daily average). The maximum annual raw EPS beads throughput shall not exceed 15,558 tons per rolling, 12-month period.

4. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

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

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

a. all 3-hour blocks of time during which the average combustion temperature within the regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and

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

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

2. The permittee shall maintain records of the following information each day for this emissions unit:

a. the company identification for each raw EPS bead material employed;

b. an identification of the blowing agents contained in each raw EPS bead material employed;

c. the VOC content, in weight percent, for each raw EPS bead material employed;

d. the quantity, in pounds, of each raw EPS bead material employed;

e. the quantity, in pounds, of all the raw EPS bead materials employed (summation of d for all raw EPS bead materials);

f. the number of hours the emissions unit was in operation;

g. the average hourly bead throughput (e/f), in pounds/hr (average);

h. the VOC content, in weight percent, of each final EPS product;

i. the total, controlled (stack) VOC emissions, in pounds, for each raw EPS bead material employed, calculated as follows:

TVOC (pounds/day) = c x d

TVOC_R (pounds/day) = d x h

TVOC_E (pounds/day) = (TVOC - TVOC_R)

TVOC_S (pounds/day) = TVOC_E x (1 - 0.002)* x (capture efficiency, as tested during the most recent emission testing that demonstrated compliance) x (1- destruction efficiency, as tested during the most recent emission testing that demonstrated compliance)

where:

TVOC = total VOCs contained in each raw bead material (pounds/day)

TVOC_R = total VOCs retained in each final bead product (pounds/day)

TVOC_E = total (fugitive and uncontrolled stack emissions, combined) VOC emissions (pounds/day)

TVOC_S = the total, controlled (stack) VOC emissions (pounds/day);

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

j. the total controlled VOC emissions, in pounds, for all the raw EPS bead materials employed (summation of i for all raw EPS bead materials);

k. the average hourly, controlled VOC emissions for all the raw EPS bead materials employed (j/f), in pound/hour (average)

l. the total fugitive VOC emissions, in pounds, for each raw EPS bead material employed, calculated as follows:

TVOC_F (pounds/day) = TVOC_E x (1 - 0.002)* x (1- capture efficiency, as tested during the most recent emission testing that demonstrated compliance) + TVOC_E x .002*

where:

TVOC_F = the total fugitive VOC emissions (pounds/day)

TVOC_E = total (fugitive and uncontrolled stack emissions, combined) VOC emissions (pounds/day);

m. the total fugitive VOC emissions, in pounds, for all the raw EPS bead materials employed (summation of l for all raw EPS bead materials);

n. the total VOC emissions, in pounds, for all the raw EPS bead materials employed (m + j); and

o. the lbs of VOC/100 pounds of EPS beads, calculated as follows:

lbs VOC/100 pounds of EPS beads = (n/e) x 100.

* This is an emission factor supplied by the permittee. It represents the percent of total emissions of VOC that are emitted as fugitive from the mold cutting and storage operations (these emissions should not be counted as part of the 30% fugitive emissions not captured by the collection system).

3. The permittee shall maintain records of the following information each month for this emissions unit:

a. the total VOC emissions, in tons, for all the raw EPS bead materials employed, in tons (calculated by summing the daily VOC emission rates, from Section 2.n, for the calendar month, divided by 2000);

b. the quantity, in tons, of all the raw EPS bead materials employed (calculated by summing the daily quantities processed, from Section 2.e, for the calendar month, divided by 2000);

c. the rolling, 12-month summation of the quantity of all the raw EPS bead materials employed, in tons; and

d. the rolling, 12-month summation of the VOC emissions (stack and fugitive, combined) for all the raw EPS bead materials employed, in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above;

b. all exceedances of the VOC content limitations of 6.5 percent and 1.8 percent, by weight;

c. all exceedances of the allowable hourly raw EPS bead materials throughput restriction of 8,200 pounds;

d. all exceedances of the rolling, 12-month raw EPS bead materials throughput restriction of 15,558 tons;

e. all exceedances of the rolling, 12-month VOC emission limitation of 255.22 tons; and

f. all exceedances of the hourly allowable VOC emission limitation of 2.53 pounds and of the 1.64 lbs VOC/100 pounds of EPS beads.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall submit quarterly summaries that include the following information:

a. a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emission unit was in operation; and

b. all records showing the use of a blowing agent other than pentane in the EPS bead materials.

3. The permittee shall submit annual reports that summarize the annual bead materials throughput and the annual VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

1.a The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.

1.b The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiencies for the regenerative thermal oxidizer of 70% and 99%, by weight, for VOCs, respectively. The emission testing shall also be conducted to demonstrate compliance with the lbs of VOC/100 lbs of EPS beads emission limitation and the hourly VOC emission limitation.

V. Testing Requirements (continued)

1.c The following test method(s) shall be employed to demonstrate compliance with the capture and destruction efficiencies, the lbs VOC/100 lbs of EPS beads, and the lbs VOC/hr emission limitations:

i. Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

ii. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency of the thermal incinerator system shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the vapor control system.

The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

1.d The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

3. During any emission testing for this emissions unit, the permittee shall record the following additional information for each run:

a. the combustion temperature within the regenerative thermal incinerator, as a 1-hour average, in degrees Fahrenheit;

b. the amount of EPS bead materials employed, in pounds;

c. the VOC content of the raw EPS beads employed, in weight percent; and

d. the VOC content of the final EPS products, in weight percent.

4. Compliance with the emission limitations established in Section A.I of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

4.a Emission Limitations: 2.53 pounds VOC/hour, 255.22 tons VOC/rolling, 12-month period

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 18, 25, or 25A, as appropriate.

The permittee may also demonstrate compliance with the hourly allowable VOC emission limitation based on the record keeping requirements established in Section A.III.2 of this permit.

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping required in Sections A.III.2 and 3 of the terms and conditions of this permit.

4.b Emission Limitation: 1.64 lbs of VOC/100 lbs of EPS beads processed

Applicable Compliance Method: The permittee shall demonstrate compliance with the lbs VOC/100 lbs of EPS beads emission limitation based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 18, 25, or 25A, as appropriate, and Section A.V.4 of this permit.

The permittee may also demonstrate compliance with the lbs VOC/100 lbs of EPS beads emission limitation based on the record keeping requirements established in Section A.III.2 of this permit.

4.c Emission Limitations: 70% capture and 99% destruction efficiencies, by weight, for VOCs

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance the methods outlined in Section A.V.2 of this permit.

4.d Emission Limitations: VOC content of the raw EPS beads shall not exceed 6.5%, by weight.

Applicable Compliance Method: Compliance with the VOC content limitation shall be determined through the record keeping required in Section A.III.3 of the terms and conditions of this permit.

4.e Emission Limitations: VOC content of the final EPS beads product shall be no less than 1.8%, by weight.

Applicable Compliance Method: Compliance with the VOC content limitation shall be determined through the record keeping required in Section A.III.3 of the terms and conditions of this permit.

4.f Usage Restrictions: 8,200 pounds EPS beads/hr and 15,558 tons EPS beads/rolling, 12-month period

Applicable Compliance Method: Compliance with the usage restrictions above shall be determined through the record keeping required in Sections A.III.2 and 3 of the terms and conditions of this permit.

5. Formulation data or Ohio EPA- or USEPA-approved test methods shall be used to determine the VOC contents of the raw EPS beads and the final EPS products.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
expandable polystyrene (EPS) line consisting of hopper, pre-expander, pneumatic transfer, curing, block molder, (2) shape molders, mold cutting, and storage	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This permit allows the use of 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(s) specified in this permit was established using 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. 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: Pentane
TLV (mg/m3): 1770
Maximum Hourly Emission Rate (lbs/hr): 134.6
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 17.3
MAGLC (mg/m3): 42.1

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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