

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

September 21, 2022

PERMIT TO INSTALL
211-02F

ISSUED TO
Michigan Foam Products, LLC

LOCATED AT
1820 Chicago Drive SW
Grand Rapids, Michigan 49519

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
N3078

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: August 29, 2022	
DATE PERMIT TO INSTALL APPROVED: September 21, 2022	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUPLASTICRESIN	Preex 9000 vacutrans batch-type resin pre-expander, canvas holding bags, Hirsch-Gruppe adjustable wall mold, hot room, wire cutting operations including one (1) GP-11000 Autowire slabbing system*, embossing area, and other associated operations to produce expanded polystyrene (EPS) foam. The pre-expander is controlled by a regenerative thermal oxidizer (RTO).	07-03-2002 / 05-04-2006 / 09-07-2011 / TBD	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUPLASTICRESIN
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Preex 9000 vacutrans batch-type resin pre-expander, canvas holding bags, Hirsch-Gruppe adjustable wall mold, hot room, wire cutting operations including one (1) GP-11000 Autowire slabbing system*, embossing area, and other associated operations to produce expanded polystyrene (EPS) foam.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

The pre-expander is controlled by a regenerative thermal oxidizer (RTO).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	115.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUPLASTICRESIN	SC V.1, V.2, V.3, VI.2, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10	R 336.1205 R 336.1702(a)
2. VOC	1909.0 lbs per 8 hours ¹	8 hours	EUPLASTICRESIN	SC V.1, V.2, V.3, VI.2, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10	R 336.1225
3. VOCs	1.13 pph	Hourly	Pre-expander emissions vented through the RTO, SV02	SC V.1, V.2, V.3, VI.2, VI.4, VI.6, VI.7, VI.8, VI.10	R 336.1225 R 336.1702(a)
4. Cumene	129 lb/yr ¹	12-month rolling time period as determined at the end of each calendar month	EUPLASTICRESIN	SC V.2, V.3, VI.3, VI.6, VI.8, VI.9, VI.10	R 336.1225

II. MATERIAL LIMIT(S)

1. The VOC content of the EPS beads used in EUPLASTICRESIN shall not exceed 6.3 pounds per 100 pounds of EPS beads processed, based upon a 12-month rolling time period as determined at the end of each month. **(R 336.1205, R 336.1225, R 336.1702(a))**

2. The permittee shall limit the throughput of EPS beads at the EUPLASTICRESIN pre-expander according to the formula below, based upon a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1225, R 336.1702(a))**

$$\sum_{12\text{-months}} \left(\left(\frac{\sum_i (U_i \times V_i)}{100} \right) - \left(\frac{\sum_i (U_i \times V_i)}{100} \times \left(PE \times \frac{DE}{100} \right) \right) \right) \leq 230,000 \text{ pounds}$$

U_i = Pounds of EPS beads from lot i used during the calendar month.

V_i = VOC content of EPS beads from lot i , in pounds of VOC per 100 pounds of beads.

PE = Weight fraction of VOC in the raw beads that is emitted during pre-expansion. The default value for this shall be 25.0 percent; the actual tested value may be used with the approval of the AQD District Supervisor

DE = VOC destruction efficiency (percent of VOC in the inlet to the thermal oxidizer that is destroyed in the thermal oxidizer) of the thermal oxidizer. The default value for this shall be 98.0 percent; the actual tested value may be used with the approval of the AQD District Supervisor.

3. The permittee shall limit the throughput of EPS beads at the EUPLASTICRESIN pre-expander according to the formula below, based upon 8 hours of operation.¹ **(R 336.1225)**

$$\sum_{8\text{Hours}} \left(\left(\frac{\sum_i (U_i \times V_i)}{100} \right) - \left(\frac{\sum_i (U_i \times V_i)}{100} \times \left(PE \times \frac{DE}{100} \right) \right) \right) \leq 1,909.0 \text{ pounds}$$

U_i = Pounds of EPS beads from lot i used during 8 hours.

V_i = VOC content of EPS beads from lot i , in pounds of VOC per 100 pounds of beads.

PE = Weight fraction of VOC in the raw beads that is emitted during expansion. The default value for this shall be 25.0 percent; the actual tested value may be used with the approval of the AQD District Supervisor

DE = VOC destruction efficiency (percent of VOC in the inlet to the thermal oxidizer that is destroyed in the thermal oxidizer) of the thermal oxidizer. The default value for this shall be 98.0 percent; the actual tested value may be used with the approval of the AQD District Supervisor.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Input feed to the pre-expander shall cease immediately, consistent with safe operating procedures, upon initiation of the RTO bypass. Input feed to the pre-expander shall not restart until the RTO is back online and functioning properly. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not operate the pre-expander unless a malfunction abatement plan (MAP) as described in Rule 911(2), is implemented and maintained.
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of PE of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the

MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of the RTO. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not input feed into the pre-expander unless it is vented to the RTO and the RTO is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining a minimum VOC destruction efficiency in the regenerative thermal oxidizer of 98.0 percent by weight and a minimum combustion temperature of 1500°F. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall equip and maintain the RTO with an audible and visual alarm system to alert operators of RTO bypass. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall follow a sampling schedule approved by the AQD District Supervisor to determine the VOC content, as received, of EPS beads used in EUPLASTICRESIN. The samples shall represent the full range of VOC content of EPS beads used in EUPLASTICRESIN and shall support an estimate of the production-weighted average VOC content of product from EUPLASTICRESIN. The permittee shall use sampling and analysis methods approved by the AQD District Supervisor. **(R 336.1205, R 336.1225, R 336.1702(a))**
2. Within 180 days after commencement of trial operation of the RTO, the permittee shall verify the VOC emission rates from the pre-expander and RTO and the RTO VOC destruction efficiency by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
3. In order to use a value higher than 25% for PE (the weight fraction of VOC in the raw beads that is emitted during expansion) in SC II.2 and II.3, the permittee shall determine the weight fraction of VOC in the raw beads that is emitted during pre-expansion across the full range of VOC content of EPS beads used in EUPLASTICRESIN and the full range of product densities produced in EUPLASTICRESIN. The permittee shall use sampling and analysis methods approved by the AQD District Supervisor. **(R 336.1205, R 336.1225, R 336.1702(a))**
4. The permittee shall conduct the required sampling and analysis outlined in SC V.3 on an annual basis or on an alternate sampling schedule or analysis approved by the AQD District Supervisor. **(R 336.1205, R 336.1225, R 336.1702(a))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep, in a satisfactory manner, a record of the pounds of VOC per 100 pounds of EPS beads for each lot of EPS beads received. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**
3. The permittee shall keep, in a satisfactory manner, 8 hour, monthly and 12-month rolling time period records of the throughput of each lot of EPS beads at the pre-expander portion of EUPLASTICRESIN. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**
4. The permittee shall keep, in a satisfactory manner, records of the VOC content, as received, of each lot of EPS beads used in EUPLASTICRESIN. The permittee shall keep all records of VOC content determinations on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**
5. The permittee shall keep, in a satisfactory manner, 8 hour, monthly and 12-month rolling time period records of the VOC emission rate from EUPLASTICRESIN using the method detailed in Appendix A. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1702(a))**
6. The permittee shall record the weight fraction of the total VOC emissions emitted at pre-expansion and the VOC destruction efficiency of the thermal oxidizer. **(R 336.1205, R 336.1225, R 336.1702(a))**
7. The permittee shall calculate and keep a record of the pounds of VOC per 100 pounds of EPS beads used at pre-expansion, for each calendar month and for a 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1205, R 336.1225, R 336.1702)**
8. The permittee shall monitor and record, in a satisfactory manner, the regenerative thermal oxidizer combustion chamber temperature on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**
9. The permittee shall keep the following information on a calendar month basis for EUPLASTICRESIN:
 - a. Pounds of each cumene-containing material used.
 - b. Cumene content, in pounds per pound, of each cumene-containing material used.
 - c. Calculations determining the monthly amount of cumene processed in pounds per calendar month.
 - d. Calculations determining the cumulative amount of cumene processed during the first 12-months and the annual amount of cumene processed thereafter, in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request.¹ **(R 336.1225)**

10. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, records of all RTO bypass events that include the date and time of each bypass, the length of the bypass, and the reason for the bypass. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**

See Appendix A

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than the startup of the RTO. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-02	24.0	30.6	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-03	16	27.2	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-EXH01	37	27.0	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV-EXH02	37	27.3	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

APPENDIX A – Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUPLASTICRESIN.

- I. The pounds of VOC per 100 pounds of EPS beads used in the processes during a calendar period shall be calculated as follows:

$$P = \frac{\sum_i (U_i \times V_i)}{\sum_i U_i}$$

where:

P = Pounds of VOC per 100 pounds of EPS beads used in the processes during the calendar period.
 U_i = Pounds of EPS beads from lot i used during the calendar period.
 V_i = VOC content of EPS beads from lot i , in pounds of VOC per 100 pounds of beads.

- II. For each lot of EPS beads (i) used in the processes, the VOC emission for the calendar period shall be calculated as follows:

$$E_i = \left(\frac{U_i \times V_i}{100} \right) - \left(\frac{U_i \times V_i}{100} \times \left(PE \times \frac{DE}{100} \right) \right)$$

where:

E_i = VOC emissions due to use of EPS beads from lot i during the calendar period, in pounds.

U_i, V_i = As above.

PE = Weight fraction of VOC in the raw beads that is emitted during pre-expansion. The default value for this shall be 25.0 percent; the actual tested value may be used with the approval of the AQD District Supervisor

DE = VOC destruction efficiency (percent of VOC in the inlet to the thermal oxidizer that is destroyed in the thermal oxidizer) of the thermal oxidizer. The default value for this shall be 98.0 percent; the actual tested value may be used with the approval of the AQD District Supervisor.

- III. The total VOC emission for the calendar period due to the use in the processes of all lots of EPS beads shall be calculated as follows:

$$T = \sum_i E_i$$

where:

T = Total VOC emissions during the calendar period, in pounds.

E_i = As above.