

Facility ID: 0387020045 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Until May 3, 2002, the permittee was required to investigate and research the feasibility of utilizing either: (1) non-photochemically reactive adhesives or (2) adhesives with a VOC content of less than 3.60 pounds VOC/gallon to be employed in flock lines numbers 1, 2 and 3. This investigation and research requirement expired two years after the final issuance of PTI No. 03-11229 (issued May 3, 2000). The permittee did submit detailed reports on the progress of their research to develop non-photochemically reactive or low VOC content adhesives.

These reports included the following information:

- a. the name, contact name and telephone number of the supplier contacted for compliant adhesives;
- b. the adhesive name and identification for any adhesive that was investigated for potential use;
- c. a description of any trials conducted including the date, amount of adhesive used and duration of the trial;
- d. a discussion of the results of the trial, including a description of the reason(s) why any adhesive failed; and
- e. the date when any approved adhesive was put into production.

These reports were submitted to Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402 and to U.S. EPA, Region V, Permits and Grants Section, Air Programs Branch, (5AR-18J), 77 West Jackson Boulevard, Chicago, Illinois, 60604. The reports were submitted annually. The first report was due one year from the date the final permit was issued (May 3, 2001), and the final report was due two years from the date the final permit was issued (May 3, 2002).

2. The following insignificant emissions units are located at this facility:
abrasive blasting units (maintenance area, molds), emissions unit Z001;
finishing area (coating, ink, adhesive, lubricants), emissions unit Z002;
injection molding presses, emissions unit Z003;
fuel oil storage tank- 1000 gallons, emissions unit Z004;
parts washers- aqueous-based cleaner, emissions unit Z005; and
misc. line oper. (mastic, 'dotter', slip coat, lube), emissions unit Z006.

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

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b State Only Enforceable Section

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
cascade line #2 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	1.74 pounds volatile organic compounds (VOC)/hour and 7.6 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See A.I.2.a.)

2. **Additional Terms and Conditions**

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 1.74 pound and the annual VOC limitation of 7.6 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. **Operational Restrictions**

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:

1.74 pounds VOC/hour, 7.6 tons VOC/year

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 2100 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 2100 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P003 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
cascade line #2 for rubber curing & extruding	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide

TLV (mg/m3): 31

Maximum Hourly Emission Rate (lbs/hr): 1.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6

MAGLC (ug/m3): 738

Pollutant: acetophenone

TLV (mg/m3): 49

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8

MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P005 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
cascade line #3 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3)	1.74 pounds volatile organic compounds (VOC)/hour and 7.6 tons VOC/year
	PTI 03-13984	
	OAC rule 3745-31-05(D)	20.8 tons VOC/rolling, 12-month period (See A.I.2.a.)
	PTI 03-13984	

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 1.74 pound and the annual VOC limitation of 7.6 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
1.74 pounds VOC/hour, 7.6 tons VOC/year

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:
 - i. multiply the maximum hourly quantity of rubber cured, 2100 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 2100 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- b. Emission Limitation:
 - 20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)
 - Applicable Compliance Method:
 - Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
- c. Production Limitation:
 - 25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)
 - Applicable Compliance Method:
 - Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P005 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
cascade line #3 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167
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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P008 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #3 oven #3	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.19 pound organic compounds (OC)/hour See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.29 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(3).
- b. There are no OC emission limitations established for this emissions unit because no photochemically reactive materials are employed in the spray booth associated with this emissions unit and no liquid organic material or any substance containing liquid organic materials comes into contact with a flame, or is baked, heat cured, or heat polymerized in the presence of oxygen in this emissions unit.
- c. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R002), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9391.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as

defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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

- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. Operational Restrictions

1. The OC emissions from the liquid organic materials used in this emissions unit shall not exceed 0.29 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions.

Compliance with the annual emission limitation for OC from the use of liquid organic materials shall be based upon a rolling, 12-month summation of the monthly emissions.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
- the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R002 (see section A.III of emissions unit R002), in pounds;
 - the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R002 (from section A.III.1.a. above);
 - the total number of hours the emissions unit was in operation; and,
 - the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
- the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and,
 - the rolling, 12-month OC emission rate, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
- all exceedances of the hourly OC emission limitation of 0.19 pound; and,
 - all exceedances of the rolling, 12-month OC emission limitation of 0.29 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.19 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

0.29 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P008 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P010 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #1 oven #2	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.08 pound organic compounds (OC)/hour See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.23 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(3).
- b. There are no OC emission limitations established for this emissions unit because no photochemically reactive materials are employed in the spray booth associated with this emissions unit and no liquid organic material or any substance containing liquid organic materials comes into contact with a flame, or is baked, heat cured, or heat polymerized in the presence of oxygen in this emissions unit.
- c. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R005), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the

associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9391.

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

- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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

- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. Operational Restrictions

1. The OC emissions from the liquid organic materials used in this emissions unit shall not exceed 0.23 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions.

Compliance with the annual emission limitation for OC from the use of liquid organic materials shall be based upon a rolling, 12-month summation of the monthly emissions.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
- the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R005 (see section A.III of emissions unit R005), in pounds;
 - the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R005 (from section A.III.1.a. above);
 - the total number of hours the emissions unit was in operation; and
 - the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
- the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and
 - the rolling, 12-month OC emission rate, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
- all exceedances of the hourly OC emission limitation of 0.08 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.23 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.08 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

0.23 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P010 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

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

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P011 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #2 oven #3	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.19 pound organic compounds (OC)/hour See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.43 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.

OAC rule 3745-18-06(E)

See A.I.2.f.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) (3).
- b. There are no OC emission limitations established for this emissions unit because no photochemically reactive materials are employed in the spray booth associated with this emissions unit and no liquid organic material or any substance containing liquid organic materials comes into contact with a flame, or is baked, heat cured, or heat polymerized in the presence of oxygen in this emissions unit.
- c. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R006), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9391.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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1. The OC emissions from the liquid organic materials used in this emissions unit shall not exceed 0.43 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions.

Compliance with the annual emission limitation for OC from the use of liquid organic materials shall be based upon a rolling, 12-month summation of the monthly emissions.

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1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R006 (see section A.III of emissions unit R006), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R006 (from section A.III.1.a. above);
 - c. the total number of hours the emissions unit was in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

- b. the rolling, 12-month OC emission rate, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the hourly OC emission limitation of 0.19 pound; and,
 - b. all exceedances of the rolling, 12-month OC emission limitation of 0.43 ton.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 0.19 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:
 - 0.43 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P011 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions		
<ol style="list-style-type: none"> 1. None 		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P012 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #1 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.b.)

- Additional Terms and Conditions**

- The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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- Operational Restrictions**

- The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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- Monitoring and/or Record Keeping Requirements**

- The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - the quantity of rubber cured and extruded, in tons;
 - the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and
 - add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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- Reporting Requirements**

- The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements

constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P012 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #1 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

- 2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P014 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #1, hot air cure oven #2 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when the permittee is not employing any photochemically reactive materials in emissions unit R008, the organic compound (OC) emissions (for emissions units R008 and P014, combined) shall not exceed 86.64 pounds/day
		On the days when the permittee is employing a photochemically reactive material in emissions unit R008, see Section A.I.2.a.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E). exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See

OAC rule 3745-17-11(B)
 OAC rule 3745-17-07(A)
 OAC rule 3745-31-05(D)
 PTI No. 03-11229

A.I.2.d.)

See section A.I.2.e.

See section A.I.2.f.

The total OC emissions for emissions units R008 and P014, combined, shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation.

2. **Additional Terms and Conditions**

- a. On the days when the permittee is employing any photochemically reactive material in emissions unit R008, the VOC content of each adhesive coating employed in emissions units R008 and P014 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]
- b. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-11229.

 On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each day for emissions units R008 and P014, combined:
 - a. the company identification for each coating material employed;
 - b. a determination of whether or not each coating material employed is a photochemically reactive material;
 - c. on the days when no photochemically reactive materials are employed in emissions unit R008, the number of gallons of each coating employed;
 - d. on the days when no photochemically reactive materials are employed in emissions unit R008, the OC content of each coating employed, in pounds per gallon, as applied;
 - e. on the days when no photochemically reactive materials are employed in emissions unit R008, the OC emission rate for each coating employed (c x d), in pounds;
 - f. on the days when no photochemically reactive materials are employed in emissions unit R008, the total OC emission rate for all the coatings employed (the summation of "e" for all the coatings), in pounds; and
 - g. on the days when any photochemically reactive material is employed in emissions unit R008, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added

at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R008 and P014, combined:
 - a. the company identification for each liquid organic material employed;
 - b. the number of gallons of each liquid organic material employed;
 - c. the OC content of each liquid organic material employed, in pounds/gallon;
 - d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and
 - e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when no photochemically reactive materials were employed in emissions unit R008, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R008 and P014, combined);
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R008 and P014, combined); and
 - c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.
 - b. Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.
 - c. VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coating materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P014 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #1, hot air cure oven #2 and cooling conveyor	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units R008 and P014 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
 MAGLC (ug/m3): 10,333

Pollutant: MEK
 TLV (mg/m3): 584

Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
 MAGLC (ug/m3): 13,904

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P015 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #5 oven #3	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.08 pound organic compounds (OC)/hour See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.22 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. **Additional Terms and Conditions**

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06(B) and 3745-18-06(E).
- b. The hourly emission limitation specified by this applicable rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R020), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9391.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in

emissions unit R020 (see section A.III of emissions unit R020), in pounds;

- b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R020 (from section A.III.1.a. above);
 - c. the total number of hours the emissions unit was in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and
 - b. the rolling, 12-month OC emission rate, in tons.
 3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the hourly OC emission limitation of 0.08 pound; and,
 - b. all exceedances of the rolling, 12-month OC emission limitation of 0.22 ton.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.08 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

0.22 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P016 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #2 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.b.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G), because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

 ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and

 iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA) . The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P016 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #2 for rubber curing and extrusion	none	none
2. Additional Terms and Conditions		
<ol style="list-style-type: none"> 1. None 		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P018 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #2, hot air cure oven #2 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when the permittee is not employing any photochemically reactive materials in emissions unit R011, the organic compound (OC) emissions (for emissions units R011 and P018, combined) shall not

exceed 86.64 pounds/day

The total OC emissions for emissions units R011 and P018, combined, shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation

On the days when the permittee is employing a photochemically reactive material in emissions unit R011, see Section A.I.2.a.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E).

OAC rule 3745-21-07(G)

exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]

OAC rule 3745-23-06(B)

See Section A.I.2.c.

OAC rule 3745-21-08(B)

See Section A.I.2.c.

OAC rule 3745-18-06(E)

Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

OAC rule 3745-17-11(B)

See section A.I.2.e.

OAC rule 3745-17-07(A)

See section A.I.2.f.

2. Additional Terms and Conditions

- a. On the days when the permittee is employing any photochemically reactive material in emissions unit R011, the VOC content of each adhesive coating employed in emissions units R011 and P018 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]
- b. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-11229.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions units R011 and P018, combined:
 - a. the company identification for each coating material employed;
 - b. a determination of whether or not each coating material employed is a photochemically reactive material;

- c. on the days when no photochemically reactive materials are employed in emissions unit R011, the number of gallons of each coating employed;
 - d. on the days when no photochemically reactive materials are employed in emissions unit R011, the OC content of each coating employed, in pounds per gallon, as applied;
 - e. on the days when no photochemically reactive materials are employed in emissions unit R011, the OC emission rate for each coating employed (c x d), in pounds;
 - f. on the days when no photochemically reactive materials are employed in emissions unit R011, the total OC emission rate for all the coatings employed (the summation of "e" for all the coatings), in pounds; and
 - g. on the days when any photochemically reactive material is employed in emissions unit R011, the VOC content of each coating, in pounds per gallon, as applied.
- Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.
- 2. The permittee shall collect and record the following information each month for emissions units R011 and P018, combined:
 - a. the company identification for each liquid organic material employed;
 - b. the number of gallons of each liquid organic material employed;
 - c. the OC content of each liquid organic material employed, in pounds/gallon;
 - d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and
 - e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.
 - 3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when no photochemically reactive materials were employed in emissions unit R011, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R011 and P018, combined);
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R011 and P018, combined); and
 - c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.
- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 86.64 pounds OC/day
 - Applicable Compliance Method:
 - Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.
 - b. Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

c. VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coating materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P018 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #2, hot air cure oven #2 and cooling conveyor	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units R011 and P018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (note: screening scenario identical to that for P014 and R008) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
 MAGLC (ug/m3): 10,333

Pollutant: MEK
 TLV (mg/m3): 584
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
 MAGLC (ug/m3): 13,904
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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P019 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #3 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984 OAC rule 3745-31-05(D) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year 20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

 ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and

 iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA) . The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are

as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P019 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #3 for rubber curing and extrusion	none	none
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental

Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- 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.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P021 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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.

Applicable Emissions Limitations/Control

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Measures</u>
flock line #3, hot air cure oven #2 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when the permittee is not employing any photochemically reactive materials in emissions unit R012, the organic compound (OC) emissions (for emissions units R012 and P021, combined) shall not exceed 86.64 pounds/day The total OC emissions for emissions units R012 and P021, combined, shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation On the days when the permittee is employing a photochemically reactive material in emissions unit R012, see Section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E). exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.] See Section A.I.2.c. See Section A.I.2.c. Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.) See section A.I.2.e. See section A.I.2.f.
	OAC rule 3745-21-07(G)	
	OAC rule 3745-23-06(B)	
	OAC rule 3745-21-08(B)	
	OAC rule 3745-18-06(E)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	

2. Additional Terms and Conditions

- a. On the days when the permittee is employing any photochemically reactive material in emissions unit R012, the VOC content of each adhesive coating employed in emissions units R012 and P021 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]
- b. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-11229.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R012 and P021, combined:
 - a. the company identification for each coating material employed;
 - b. a determination of whether or not each coating material employed is a photochemically reactive material;
 - c. on the days when no photochemically reactive materials are employed in emissions unit R012, the number of gallons of each coating employed;
 - d. on the days when no photochemically reactive materials are employed in emissions unit R012, the OC content of each coating employed, in pounds per gallon, as applied;
 - e. on the days when no photochemically reactive materials are employed in emissions unit R012, the OC emission rate for each coating employed (c x d), in pounds;
 - f. on the days when no photochemically reactive materials are employed in emissions unit R012, the total OC emission rate for all the coatings employed (the summation of "e" for all the coatings), in pounds; and
 - g. on the days when any photochemically reactive material is employed in emissions unit R012, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each month for emissions units R012 and P021, combined:
 - a. the company identification for each liquid organic material employed;
 - b. the number of gallons of each liquid organic material employed;
 - c. the OC content of each liquid organic material employed, in pounds/gallon;
 - d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and
 - e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when no photochemically reactive materials were employed in emissions unit R012, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R012 and P021, combined);
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R012 and P021, combined); and
 - c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 86.64 pounds OC/day
 - Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

b. Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

c. VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coating materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P021 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #3, hot air cure oven #2 and cooling conveyor	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R012 and P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (note: screening scenario identical to that for P014 and R008) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P023 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #6 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;* and
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA) . The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P023 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #6 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P024 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #6, coating cure oven #1	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.19 pound organic compounds (OC)/hour
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.23 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06(B) and 3745-18-06(E).
- b. The hourly emission limitation specified by this applicable rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R013), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9391.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R013 (see section A.III of emissions unit R013), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the

emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R013 (from section A.III.1.a. above);

- c. the total number of hours the emissions unit was in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and
 - b. the rolling, 12-month OC emission rate, in tons.
 3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the hourly OC emission limitation of 0.19 pound; and,
 - b. all exceedances of the rolling, 12-month OC emission limitation of 0.23 ton.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.19 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

0.23 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P024 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P025 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #6, coating cure oven 2	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.11 pound organic compounds (OC)/hour
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.08 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06(B) and 3745-18-06(E).
- b. The hourly emission limitation specified by this applicable rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R017), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9391.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R017 (see section A.III of emissions unit R017), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R017 (from section A.III.1.a. above);
 - c. the total number of hours the emissions unit was in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and
 - b. the rolling, 12-month OC emission rate, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the hourly OC emission limitation of 0.11 pound; and,
 - b. all exceedances of the rolling, 12-month OC emission limitation of 0.08 ton.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.11 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

0.08 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more

stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P025 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P026 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer line #7 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984 OAC rule 3745-31-05(D) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year 20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

- 1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee

shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P026 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer line #7 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P028 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #8 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. **Additional Terms and Conditions**

- The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

- The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - the quantity of rubber cured and extruded, in tons;
 - the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and
 - add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P028 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #8 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P037 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #9 coating cure oven	OAC rule 3745-31-05(A)(3) PTI No. 03-9822	0.23 pound organic compounds (OC)/hour The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G)(2) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-9822	0.66 ton OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.a.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-17-11(B)	See Section A.I.2.d.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.f.)

2. Additional Terms and Conditions

- a. The hourly emission limitation specified by this applicable rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- b. For purposes of calculating the organic compound emission rates for this emissions unit (P037) and the associated spray booth (emissions unit R024), the permittee shall utilize a value of 85 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 15 percent of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the spray booth is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9822.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R024 (see section A.III of emissions unit R024), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R024 (from section A.III.1.a. above);
 - c. the total number of hours the emissions unit was in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
- 2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and
 - b. the rolling, 12-month OC emission rate, in tons.
- 3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9822, issued on May 27, 1997: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the hourly OC emission limitation of 0.23 pound; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 0.66 ton.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9822, issued on May 27, 1997: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.23 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

0.66 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9822, issued on May 27, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P037 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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> |
|---|---|--------------------------------------|--|
| 2. Additional Terms and Conditions | | | |
| 1. | None | | |

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P038 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
cascade line #1 for rubber curing & extruding	OAC rule 3745-31-05(A)(3) PTI 03-13984 OAC rule 3745-31-05(D)	1.74 pounds volatile organic compounds (VOC)/hour and 7.6 tons VOC/year 20.8 tons VOC/rolling, 12-month period (See A.I.2.a.)

2. **Additional Terms and Conditions**

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 1.74 pound and the annual VOC limitation of 7.6 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

- 1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 1.74 pound VOC/hour, 7.6 tons VOC/year

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 2100 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 2100 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation will be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P038 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
cascade line #1 for rubber curing & extruding	none	none

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide

TLV (mg/m3): 31

Maximum Hourly Emission Rate (lbs/hr): 1.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6

MAGLC (ug/m3): 738

Pollutant: acetophenone

TLV (mg/m3): 49

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8

MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P039 Issuance type: Title V Final Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
cascade line #1 coating cure oven	OAC rule 3745-31-05(A)(3) PTI No. 03-9900	0.57 pound organic compounds (OC)/hour 13.7 pounds OC/day
	OAC rule 3745-31-05(D) PTI No. 03-9900	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E). 0.50 ton OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.a.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-17-11(B)	See Section A.I.2.d.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.f.)	

2. **Additional Terms and Conditions**

- a. The hourly emission limitation specified by this applicable rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. For purposes of calculating the organic compound emission rates for this emissions unit (P039) and the associated spray booth (emissions unit R026), the permittee shall utilize a value of 85 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 15 percent of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the spray booth is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best

available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-9900.

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

- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R026 (see section A.III of emissions unit R026), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R026 (from section A.III.1.a. above);
 - c. the total number of hours the emissions unit was in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and
 - b. the rolling, 12-month OC emission rate, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9900, issued on May 21, 1997: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the hourly OC emission limitation of 0.57 pound;
 - b. all exceedances of the daily OC emission limitation of 13.7 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 0.50 ton.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9900, issued on May 21, 1997: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed

into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.57 pound OC/hour
13.7 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations based on the record keeping requirements established in section A.III.1 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

0.50 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1 and 2 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9900, issued on May 21, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P039 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: P044 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #4, coating cure oven #1 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-10454	The organic compound (OC) emissions (for emissions units R029 and P044, combined) shall not exceed 77.1 pounds/day, from the adhesive coatings usage.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E). exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.a.]
	OAC rule 3745-23-06(B)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.b.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.c.)
	OAC rule 3745-17-11(B)	See section A.I.2.d.
	OAC rule 3745-17-07(A)	See section A.I.2.e.
	OAC rule 3745-31-05(D)	The total OC emissions (for emissions units R029 and

PTI No. 03-10454

P044, combined) shall not exceed 7.3 tons OC/year, based upon a rolling, 12-month summation, from the adhesive coatings usage.

2. **Additional Terms and Conditions**

- a. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- b. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-0454.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- c. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- e. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each day for emissions units R029 and P044, combined:
 - a. the company identification for each adhesive coating employed;
 - c. the number of gallons of each adhesive coating employed;
 - d. the OC content of each adhesive coating employed, in pounds per gallon;
 - e. the OC emission rate for each adhesive coating employed (c x d), in pounds; and
 - f. the total OC emission rate for all the adhesive coatings employed (the summation of e for all adhesive coatings), in pounds.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each month for emissions units R029 and P044, combined:
 - a. the total OC emission rate for all the adhesive coatings employed, in pounds (calculated by summing the daily OC emission rates, from section A.III.1.f, for the calendar month; and
 - b. the rolling, 12-month OC emission rate for all the adhesive coatings employed, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10454, issued on September 10, 1998: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. all exceedances of the daily OC emission limitation of 77.1 pounds (for emissions units R029 and P044, combined); and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 7.3 tons (for emissions units R029 and P044, combined).Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10454, issued on September 10, 1998: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
77.1 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.
 - b. Emission Limitation:
7.3 tons OC/rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-10454, issued on September 10, 1998: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P044 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #4, coating cure oven #1 and cooling conveyor	none	none

- Additional Terms and Conditions**

- None

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- Operational Restrictions**

- None

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- Monitoring and/or Record Keeping Requirements**

- The permit to install for emissions units P044 and R029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
 MAGLC (ug/m3): 10,333

Pollutant: MEK
 TLV (mg/m3): 584
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
 MAGLC (ug/m3): 13,904

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

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 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.

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P046 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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
dual durometer line #9 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984 OAC rule 3745-31-05(D) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year 20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.) A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. **Operational Restrictions**

- 1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P046 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #9 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using

data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P049 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #4 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3)	0.99 pound volatile organic compounds (VOC)/hour,
	PTI 03-13984	4.3 tons VOC/year
	OAC rule 3745-31-05(D)	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)
	PTI 03-13984	

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

 ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and

 iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are

as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P049 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #4 for rubber curing and extrusion	none	none
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

- 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental

Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- 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.).
- c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P050 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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.

Applicable Emissions Limitations/Control

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Measures
dual durometer line #1 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. **Additional Terms and Conditions**

- The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

- The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - the quantity of rubber cured and extruded, in tons;
 - the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P050 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #1 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

1. None

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- II. **Operational Restrictions**

1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P051 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer line #2 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984 OAC rule 3745-31-05(D) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year 20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- b. Emission Limitation:
 - 20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)
 - Applicable Compliance Method:
 - Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
- c. Production Limitation:
 - 25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)
 - Applicable Compliance Method:
 - Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P051 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer line #2 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167
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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P052 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #3 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes

compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P052 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer line #3 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

- 2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an

evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P053 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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
dual durometer line #4 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3)	0.99 pound volatile organic compounds (VOC)/hour,
	PTI 03-13984	4.3 tons VOC/year
	OAC rule 3745-31-05(D)	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)
PTI 03-13984		

2. **Additional Terms and Conditions**
 - a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
 - b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
 - c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed

into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
 - c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P053 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #4 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide
 TLV (mg/m3): 31
 Maximum Hourly Emission Rate (lbs/hr): 1.36
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
 MAGLC (ug/m3): 738

Pollutant: acetophenone
 TLV (mg/m3): 49
 Maximum Hourly Emission Rate (lbs/hr): 0.48
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
 MAGLC (ug/m3): 1,167

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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to

determine that the changed emissions unit will 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.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P054 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer line #5 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984 OAC rule 3745-31-05(D) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year 20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

- a. The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).
- b. The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.
- c. The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:
 - i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*
 - ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded;* and
 - iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;
 - c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,
 - d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

 - i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;
 - ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.0000352 pound VOC/pound of rubber extruded; and,
 - iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

b. Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

c. Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P054 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #5 for rubber curing and extrusion	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Carbon Disulfide

TLV (mg/m3): 31

Maximum Hourly Emission Rate (lbs/hr): 1.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6

MAGLC (ug/m3): 738

Pollutant: acetophenone

TLV (mg/m3): 49

Maximum Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8

MAGLC (ug/m3): 1,167

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
 - c. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P055 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
primer curing oven - Cascade line #2 and coating cure oven #1	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R009, P055, R030 and P056, combined
	OAC rule 3745-21-07(G)(3)	See Section A.II. 3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
OAC rule 3745-21-08(B)	See section A.I.2.c.	
OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)	

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13436.

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

- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. For purposes of federal enforceability, all OCs are considered to be VOCs.
- f. For purposes of calculating the combined OC emission rates for emissions units P055 and P056 and their associated spray booths (R009 and R030, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P055 and P056. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- g. The permittee has requested a federally enforceable emission limitation for emissions units R009, P055, R030 and P056, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.
- h. In accordance with OAC rule 3745-21-07(G)(3), emissions units P055 and P056, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R009 and R030) associated with these ovens (emissions units P055 and P056) are required to employ only non-photochemically reactive materials.

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II. Operational Restrictions

- 1. The maximum annual coating usages for emissions units R009, P055, R030 and P056, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.
- 2. The maximum OC content of the primer coatings employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions units P055 and P056, combined:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R009 (see section A.III of emissions unit R009) and in emissions unit R030 (see section A.III of emissions unit R030), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions units (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R009 and R030, combined (from section A.III.1.a. above);
 - c. the total number of hours each of emissions units P055 and P056 were in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).
- 2. The permittee shall collect and record the following information each month for emissions units R009, P055, R030 and P056, combined:
 - a. the company name and identification for each coating (i.e., primer coat or topcoat) and cleanup material employed;
 - b. the OC content of each coating and cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed [(b x c)/2000], in tons;
 - e. the total OC emissions rate for all the coatings and cleanup materials employed (summation of d for all coatings + summation of d for all cleanup materials), in tons;
 - f. the rolling, 12-month OC emission rate, in tons;
 - g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);
 - h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and
 - i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;
 - b. all exceedances of the hourly OC emission limitation of 3.0 pounds;
 - c. all exceedances of the daily OC emission limitation of 15.0 pounds;
 - d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and
 - e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

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

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.
 - b. Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R009, P055, R030, and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.
 - c. Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

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VI. Miscellaneous Requirements

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
primer curing oven - Cascade line #2 and coating curing oven #1	none	none

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0387020045 Emissions Unit ID: P056 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
topcoat curing oven - Cascade line #2 and coating cure oven #2	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R009, P055, R030 and P056, combined
	OAC rule 3745-21-07(G)(3)	See Section A.II. 3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
	OAC rule 3745-21-08(B)	See section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13436.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. For purposes of federal enforceability, all OCs are considered to be VOCs.
- f. For purposes of calculating the combined OC emission rates for emissions units P055 and P056 and their associated spray booths (R009 and R030, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P055 and P056. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- g. The permittee has requested a federally enforceable emission limitation for emissions units R009, P055, R030 and P056, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.
- h. In accordance with OAC rule 3745-21-07(G)(3), emissions units P055 and P056, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths

(emissions units R009 and R030) associated with these ovens (emissions units P055 and P056) are required to employ only non-photochemically reactive materials.

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II. Operational Restrictions

1. The maximum annual coating usages for emissions units R009, P055, R030 and P056, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.
2. The maximum OC content of the primer coatings employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units P055 and P056, combined:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R009 (see section A.III of emissions unit R009) and in emissions unit R030 (see section A.III of emissions unit R030), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions units (see section A.1.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R009 and R030, combined (from section A.III.1.a. above);
 - c. the total number of hours each of emissions units P055 and P056 were in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).
2. The permittee shall collect and record the following information each month for emissions units R009, P055, R030 and P056, combined:
 - a. the company name and identification for each coating (i.e., primer coat or topcoat) and cleanup material employed;
 - b. the OC content of each coating and cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed $[(b \times c)/2000]$, in tons;
 - e. the total OC emissions rate for all the coatings and cleanup materials employed (summation of d for all coatings + summation of d for all cleanup materials), in tons;
 - f. the rolling, 12-month OC emission rate, in tons;
 - g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);
 - h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and
 - i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;
 - b. all exceedances of the hourly OC emission limitation of 3.0 pounds;
 - c. all exceedances of the daily OC emission limitation of 15.0 pounds;
 - d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and
 - e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

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V. **Testing Requirements**

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

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.
 - b. Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R009, P055, R030, and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.
 - c. Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P056 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
topcoat curing oven - Cascade line #2 and coating cure oven #2	none	none

2. **Additional Terms and Conditions**

1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0387020045 Emissions Unit ID: P057 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
primer curing oven - Cascade line #3 and coating cure oven #1	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R007, P057, R031, and P058, combined
	OAC rule 3745-21-07(G)(3)	See Section A.II. 3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined

OAC rule 3745-17-11(B)	See section A.I.2.a.
OAC rule 3745-17-07(A)	See section A.I.2.b.
OAC rule 3745-23-06(B)	See section A.I.2.c.
OAC rule 3745-21-08(B)	See section A.I.2.c.
OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13436.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. For purposes of federal enforceability, all OC is considered to be VOCs
- f. For purposes of calculating the combined OC emission rates for emissions units P057 and P058 and their associated spray booths (R007 and R031, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P057 and P058. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- g. The permittee has requested a federally enforceable emission limitation for emissions units R007, P057, R031, and P058, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.
- h. In accordance with OAC rule 3745-21-07(G)(3), emissions units P057 and P058, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R007 and R031) associated with these ovens (emissions units P057 and P058) are required to employ only non-photochemically reactive materials.

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II. Operational Restrictions

1. The maximum annual coating usages for emissions units R007, P057, R031, and P058, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.
2. The maximum OC content of the primer coatings employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units P057 and P058, combined:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R007 (see section A.III of emissions unit R007) and in emissions unit R031 (see section A.III

of emissions unit R031), in pounds;

- b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions unit (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R007 and R031, combined (from section A.III.1.a. above);
 - c. the total number of hours each of emissions units P057 and P058 were in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).
2. The permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, combined:
- a. the company name and identification for each coating (i.e., primer coat or topcoat) employed;
 - b. the OC content of each coating employed, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating employed $[(b \times c)/2000]$, in tons;
 - e. the total OC emissions rate for all the coatings employed (summation of d for all coatings), in tons;
 - f. the rolling, 12-month OC emission rate, in tons;
 - g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);
 - h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and
 - i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;
 - b. all exceedances of the hourly OC emission limitation of 3.0 pounds;
 - c. all exceedances of the daily OC emission limitation of 15.0 pounds;
 - d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and
 - e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

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

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.
 - b. Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R007, P057, R031, and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.
 - c. Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.

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

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: P057 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
primer curing oven - Cascade line #3 and coating cure oven #1	none	none
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0387020045 Emissions Unit ID: P058 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
topcoat curing oven - Cascade line #3 and coating cure oven #2	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R007, P057, R031, and P058, combined
	OAC rule 3745-21-07(G)(3)	See Section A.II. 3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
OAC rule 3745-21-08(B)	See section A.I.2.c.	
OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)	

2. **Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13436.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until

the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. For purposes of federal enforceability, all OC is considered to be VOCs
- f. For purposes of calculating the combined OC emission rates for emissions units P057 and P058 and their associated spray booths (R007 and R031, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P057 and P058. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- g. The permittee has requested a federally enforceable emission limitation for emissions units R007, P057, R031, and P058, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.
- h. In accordance with OAC rule 3745-21-07(G)(3), emissions units P057 and P058, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R007 and R031) associated with these ovens (emissions units P057 and P058) are required to employ only non-photochemically reactive materials.

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II. Operational Restrictions

- 1. The maximum annual coating usages for emissions units R007, P057, R031, and P058, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.
- 2. The maximum OC content of the primer coatings employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for emissions units P057 and P058, combined:
 - a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R007 (see section A.III of emissions unit R007) and in emissions unit R031 (see section A.III of emissions unit R031), in pounds;
 - b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions unit (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R007 and R031, combined (from section A.III.1.a. above);
 - c. the total number of hours each of emissions units P057 and P058 were in operation; and
 - d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).
- 2. The permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, combined:
 - a. the company name and identification for each coating (i.e., primer coat or topcoat) employed;
 - b. the OC content of each coating employed, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating employed [(b x c)/2000], in tons;
 - e. the total OC emissions rate for all the coatings employed (summation of d for all coatings), in tons;
 - f. the rolling, 12-month OC emission rate, in tons;
 - g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);

h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and

i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;
 - b. all exceedances of the hourly OC emission limitation of 3.0 pounds;
 - c. all exceedances of the daily OC emission limitation of 15.0 pounds;
 - d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and
 - e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

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V. **Testing Requirements**

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

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.
 - b. Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R007, P057, R031, and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.
 - c. Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: P058 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
topcoat curing oven - Cascade line #3 and coating cure oven #2	none	none

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 0387020045 Emissions Unit ID: P067 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under

state law only.

1. None.

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 durometer line #4 curing oven	OAC rule 3745-31-05(A)(3) PTI No. 03-13097	2.73 tons organic compounds/year (for this emissions unit) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G)(3) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13097	4.52 tons OC/rolling, 12-month summation of the monthly OC emission rates, for emissions units R003 and P067, combined
	OAC rule 3745-21-07(G)(3)	3.0 pounds OC/hour not to exceed 15.0 pounds OC/day (for this emissions unit)
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-17-11(B)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)	

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13097.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).
- e. For purposes of calculating the combined OC emission rates for this emissions unit and its associated spray booth (R003), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January 1996. The "split" of OC emissions between the spray booth and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- f. For purposes of federal enforceability, all OCs are considered to be VOCs.
- f. The monitoring, record keeping and reporting requirements to ensure compliance with the annual allowable of 4.52 tons OC/rolling, 12-month period are established in Sections A.III.1 and 2 of the permit for emissions unit R003. Therefore, no additional monitoring, record keeping and reporting requirements are necessary to ensure compliance with this emission limitation.

- g. The permittee has requested a federally enforceable emission limitation for emissions units R003 and P067, combined, of 4.52 tons OC per year, based on the OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (see A.II.1 - A.II.3).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
- the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R003 (see section A.III.1.f of emissions unit R003), in pounds;
 - the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.1.2.e above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R003 (from section A.III.1.a. above);
 - the total number of hours the emissions unit was in operation; and
 - the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
- all exceedances of the hourly OC emission limitation of 3.0 pounds; and
 - all exceedances of the daily OC emission limitation of 15.0 pounds.
- Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
- Emission Limitations:
3.0 pounds OC/hour and 15.0 pounds OC/day
2.73 tons OC/year
- Applicable Compliance Method:
- The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations based on the record keeping requirements established in section A.III.1 of this permit.
- If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
- Compliance with the annual allowable OC emission limitation shall be assumed as long as compliance with the daily allowable OC emission limitation is maintained (the annual allowable OC emission limitation was determined by multiplying the daily allowable OC emission limitation by 365, and then dividing by 2000).

- b. Emission Limitation:
 - 4.52 tons OC/rolling, 12-month period (for emissions units R003 and P067, combined)
 - Applicable Compliance Method:
 - The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of the permit for emissions unit R003.
- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: P067 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R002 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #3 paint booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	87.12 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials
	OAC rule 3745-31-05(D) PTI No. 03-9391	See Section A.I.2.a. 5.52 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 pound particulate emissions (PE)/hour Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A), and 3745-21-07(G).
- b. For purposes of calculating the organic compound emission rates for this emissions unit (R002) and the associated oven (emissions unit P008), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. **Operational Restrictions**

- 1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 87.12 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 5.52 tons.

Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2 and A.IV.3. The reporting requirements contained in the above-

referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

87.12 pounds OC/day
5.52 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in sections A.III.1 and 2 of this permit.
 - b. Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).
 - c. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R002 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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
dual durometer extrusion line #4 paint booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13097	1.51 pounds organic compounds (OC)/hour, from the use of coatings
		0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year
	OAC rule 3745-31-05(D) PTI No. 03-13097	See Section A.I.2.a. 4.52 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R003 and P067, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.b. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the organic compound emission rates for this emissions unit (R003) and the associated oven (emissions unit P067), the permittee shall utilize a value of 90 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 10 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The hourly OC emission limitation of 1.51 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.

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II. Operational Restrictions

- 1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds; and
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.c.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit).
- 2. The permittee shall calculate and record the following information each month for emissions units R003 and P067, combined:

- a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - h. the total OC emissions for all the coatings and cleanup materials employed (f + g), in pounds; and
 - i. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 4.52 tons (for emissions units R003 and P067, combined). Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

1.51 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon of coating) by the maximum hourly coating usage rate (gallon/hour) and then by 0.9.*

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

* The booth/oven split was determined to be 90/10, based on the results of emission testing conducted in September of 1989.
 - b. Emission Limitation:

4.52 tons OC/year, based on a rolling, 12-month summation (for emissions units R003 and P067,

combined) from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual OC emission limitation through the record keeping required in sections A.III.1 and 2 of this permit.

c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000).

d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R003 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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> |
|---|---|--------------------------------------|--|
| 2. Additional Terms and Conditions | | | |
| 1. | None | | |

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: R004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
offline spray booth	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	on days when no photochemically reactive materials are employed: 91.68 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials

OAC rule 3745-31-05(D)
PTI No. 03-9391

See Section A.I.2.a.

1.52 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, from the use of coating and cleanup materials

OAC rule 3745-17-11(B)(1)
OAC rule 3745-17-07(A)

0.551 pound particulate emissions (PE)/hour

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

OAC rule 3745-21-07(G)(2)

on days when any photochemically reactive materials are employed:

8 pounds organic compounds (OC)/hour,

40 pounds OC/day

2. Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).

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II. Operational Restrictions

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

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
- the company identification for each coating and cleanup material employed;
 - a determination of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - the number of gallons of each coating and cleanup material employed;
 - the OC content of each coating and cleanup material employed, in pounds per gallon;
 - on the days when only no photochemically reactive materials are employed, the OC emission rate for each coating and cleanup material employed (c x d), in pounds;
 - on the days when only no photochemically materials are employed, the total OC emission rate for all the coatings and cleanup materials employed (the summation of "e" for all coatings + the summation of "e" for all cleanup materials), in pounds;
 - on the days when any photochemically reactive material is employed, the OC emission rate for each coating and photochemically reactive cleanup material (c x d), in pounds;
 - on the days when any photochemically reactive material is employed, the OC emission rate for all the coatings and photochemically reactive cleanup materials [summation of "g" for all coatings + summation of "g" for all photochemically reactive cleanup materials], in pounds;
 - on the days when any photochemically reactive material is employed, the number of hours the emissions unit was in operation;
 - on the days when any photochemically reactive material is employed, the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials (h/i), in pounds (average); and
 - the total OC emissions for all the coating and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials].
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
- the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.k) for the calendar month, in pounds; and
 - the rolling, 12-month OC emission rate, in tons.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when only no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 91.68 pounds;
 - b. on the days when any photochemically reactive material was employed, all exceedances of the hourly and/or daily OC emission limitations of 8.0 pounds and 40 pounds, respectively; and
 - c. all exceedances of the rolling, 12-month OC emission limitation of 1.52 tons.Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1. and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

8 pounds OC/hour, not to exceed 40 pounds OC/day, on days when any photochemically reactive material is employed

91.68 pounds OC/day, on days when no photochemically reactive materials are employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable OC emission limitations above through the record keeping required in section A.III.1 of this permit.
 - b. Emission Limitation:

1.52 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the OC emission limitation above through the record keeping required in section A.III.3 of this permit.
 - c. Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).
 - d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R005 Issuance type: Title V Final Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #1 spray booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	35.76 pounds organic compounds (OC)/day
		See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	4.46 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 pound particulate emissions (PE)/hour
		Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A) and 3745-21-07(G).
- b. For purposes of calculating the organic compound emission rates for this emissions unit (R005) and the associated oven (emissions unit P010), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. **Operational Restrictions**

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 35.76 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 4.46 tons.

Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2, and A.IV.3. The reporting requirements contained in the above-

referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

35.76 pounds OC/day, 4.46 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in Sections A.III.1 and 2 of this permit.
 - b. Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).
 - c. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R005 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R006 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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.

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 durometer extrusion line #2 spray booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	87.12 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials
	OAC rule 3745-31-05(D) PTI No. 03-9391	See Section A.1.2.a. 8.19 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 pound particulate emissions (PE)/hour Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).
- b. For purposes of calculating the organic compound emission rates for this emissions unit (R006) and the associated oven (emissions unit P011), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. **Operational Restrictions**

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material;
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.1.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

- g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

- 1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
- 2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 87.12 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.19 tons.

Each report shall be submitted within 30 days after the deviation occurs.
- 3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
- 4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 87.12 pounds OC/day
 - 8.19 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in sections A.III.1 and 2 of this permit.
 - b. Emission Limitation:
 - 0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R006 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R007 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
primer spray booth - Cascade line #3 spray booth #1, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	3.43 pounds organic compounds (OC)/hour, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year
	OAC rule 3745-31-05(D) PTI No. 03-13436	See Section A.I.2.a. 6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R007, P057, R031 and P058, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.b. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the organic compound emission rates for this emissions unit (R007) and the associated oven (emissions unit P057), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted

uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

- d. The hourly OC emission limitation of 3.43 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds; and
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.
2. The permittee shall calculate and record the following information each month for emissions units R007, P057, R031 and P058, combined:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each coating and cleanup material employed, in gallons;
 - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and
 - g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R007, P057, R031 and P058, combined). Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

3.43 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon of coating) by the maximum hourly coating usage rate (gallon/hour) and then by 0.95.*

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The booth/oven split was determined to be 95/5, based on the results of emission testing conducted in September of 1989.
 - b. Emission Limitation:

6.5 tons OC/year, based on a rolling, 12-month summation (for emissions units R007, P057, R031, and P058, combined) from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual OC emission limitation through the record keeping required in sections A.III.1 and 2 of this permit.
 - c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000).
 - d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and

cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R007 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R008 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #1 adhesive booth	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when no photochemically reactive materials are employed, the organic compound (OC) emissions (for emissions units R008 and P014, combined) shall not exceed 86.64 pounds/day, from the use of coatings. 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year (from the flocking booth) On the days when any photochemically reactive material is employed, see Section A.I.2.a. See section A.I.2.b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-17-07(A). The total OC emissions (for emissions units R008 and P014, combined) shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation. exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.] See Section A.I.2.c. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-31-05(D) PTI No. 03-11229	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	

2. Additional Terms and Conditions

- a. On the days when any photochemically reactive material is employed, the VOC content of each adhesive coating employed in emissions units R008 and P014 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]
- b. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R008 and P014, combined:
 - a. the company identification for each coating material employed;
 - b. a determination of whether or not each coating material employed is a photochemically reactive material;
 - c. on the days when no photochemically reactive materials are employed, the number of gallons of each coating employed;
 - d. on the days when no photochemically reactive materials are employed, the OC content of each coating employed, in pounds per gallon;
 - e. on the days when no photochemically reactive materials are employed, the OC emission rate for each coating employed (c x d), in pounds;
 - f. on the days when no photochemically reactive materials are employed, the total OC emission rate for all the coatings employed (the summation of "e" for coatings), in pounds; and
 - g. on the days when any photochemically reactive coating is employed, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each month for emissions units R008 and P014, combined:
 - a. the company identification for each liquid organic material employed;
 - b. the number of gallons of each liquid organic material employed;
 - c. the OC content of each liquid organic material employed, in pounds/gallon;
 - d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and
 - e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R008 and P014, combined);
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R008 and P014, combined); and
 - c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

b. Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

c. VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

d. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year - from flocking booth

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2000).

e. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R008 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #1 adhesive booth	none	none
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for emissions units R008 and P014 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
 MAGLC (ug/m3): 10,333

Pollutant: MEK
 TLV (mg/m3): 584
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
 MAGLC (ug/m3): 13,904

- 2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R009 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Cascade line #2 spray booth #1, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	3.43 pounds organic compounds (OC)/hour, from the use of coatings
		0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year
		See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R009, P055, R030, and P056, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.

OAC rule 3745-17-07(A)

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

OAC rule 3745-21-07(G)

See Section A.II.1.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for emissions units R009 and R030 and the associated ovens P055 and P056, the permittee shall utilize a value of 90 percent as the percentage of the OC employed in R009 and R030 that are emitted uncontrolled from R009 and R030. The remaining 10 percent of the OC employed in R009 and R030 shall be considered to be the uncontrolled emissions for P055 and P056. This "split" of OC emissions between the spray booths and the ovens is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).
- d. The hourly OC emission limitation of 3.43 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.

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1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds; and
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.
2. The permittee shall calculate and record the following information each month for emissions units R009, P055, R030 and P056, combined:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each coating and cleanup material employed, in gallons;
 - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and
 - g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements

constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R009, P055, R030 and P056, combined). Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

3.43 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon of coating) by the maximum hourly coating usage rate (gallon/hour) and then by 0.95.*

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

* The booth/oven split was determined to be 95/5, based on the results of emission testing conducted in September of 1989.
 - b. Emission Limitation:

6.5 tons OC/year, based on a rolling, 12-month summation (for emissions units R009, P055, R030, and P056, combined) from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual OC emission limitation through the record keeping required in sections A.III.1 and 2 of this permit.
 - c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1 - TE) \times (1 - CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000).

d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R009 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R011 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
flock line #2 adhesive booth	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when no photochemically reactive materials are employed, the organic compound (OC) emissions (for emissions units R011 and P018, combined) shall not exceed 86.64 pounds/day, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year (from the flocking booth) On the days when any photochemically reactive material is employed, see Section A.I.2.a. See section A.I.2.b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-17-07(A). The total OC emissions (for emissions units R011 and P018, combined) shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation. exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.] See Section A.I.2.c. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-31-05(D) PTI No. 03-11229	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)	

2. **Additional Terms and Conditions**

- a. On the days when any photochemically reactive material is employed, the VOC content of each adhesive coating employed in emissions units R011 and P018 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section

- A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]
- b. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R011 and P018, combined:
 - a. the company identification for each coating material employed;
 - b. a determination of whether or not each coating material employed is a photochemically reactive material;
 - c. on the days when no photochemically reactive materials are employed, the number of gallons of each coating employed;
 - d. on the days when no photochemically reactive materials are employed, the OC content of each coating employed, in pounds per gallon;
 - e. on the days when no photochemically reactive materials are employed, the OC emission rate for each coating employed (c x d), in pounds;
 - f. on the days when no photochemically reactive materials are employed, the total OC emission rate for all the coatings employed (the summation of "e" for coatings), in pounds; and
 - g. on the days when any photochemically reactive coating is employed, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each month for emissions units R011 and P018, combined:
 - a. the company identification for each liquid organic material employed;
 - b. the number of gallons of each liquid organic material employed;
 - c. the OC content of each liquid organic material employed, in pounds/gallon;
 - d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and
 - e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R011 and P018, combined);
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R011 and P018, combined); and
 - c. on the days when any photochemically reactive material was employed, all exceedances of the VOC

content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.
 - b. Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.
 - c. VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.
 - d. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year - from flocking booth

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2000).
 - e. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coatings

and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R011 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #2 adhesive booth	none	none
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R011 and P018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (note: screening scenario identical to that for P014 and R008) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
 MAGLC (ug/m3): 10,333

Pollutant: MEK
 TLV (mg/m3): 584
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350

MAGLC (ug/m3): 13,904

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defin
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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R012 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #3 adhesive booth	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when no photochemically reactive materials are employed, the organic compound (OC) emissions (for emissions units R012 and P021, combined) shall not exceed 86.64 pounds/day, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year (from the flocking booth) On the days when any photochemically reactive material is employed, see Section A.I.2.a. See section A.I.2.b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-17-07(A). The total OC emissions (for emissions units R012 and P021, combined) shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation. exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.] See Section A.I.2.c. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-31-05(D) PTI No. 03-11229	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	

2. **Additional Terms and Conditions**

- a. On the days when any photochemically reactive material is employed, the VOC content of each adhesive coating employed in emissions units R012 and P021 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]
- b. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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II. **Operational Restrictions**

- 1. None

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

- 1. The permittee shall collect and record the following information each day for emissions units R012 and P021, combined:
 - a. the company identification for each coating material employed;
 - b. a determination of whether or not each coating material employed is a photochemically reactive material;
 - c. on the days when no photochemically reactive materials are employed, the number of gallons of each coating employed;
 - d. on the days when no photochemically reactive materials are employed, the OC content of each coating employed, in pounds per gallon;
 - e. on the days when no photochemically reactive materials are employed, the OC emission rate for each coating employed (c x d), in pounds;
 - f. on the days when no photochemically reactive materials are employed, the total OC emission rate for all the coatings employed (the summation of "e" for coatings), in pounds; and
 - g. on the days when any photochemically reactive coating is employed, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R012 and P021, combined:
 - a. the company identification for each liquid organic material employed;
 - b. the number of gallons of each liquid organic material employed;
 - c. the OC content of each liquid organic material employed, in pounds/gallon;
 - d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and
 - e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:
 - a. on the days when no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R012 and P021, combined);
 - b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R012 and P021, combined); and
 - c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.
 - b. Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.
 - c. VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping

requirements established in Section A.III.1 of this permit.

d. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year - from flocking booth

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2000).

e. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R012 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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</u>
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		<u>Measures</u>
	flock line #3 adhesive booth	none
2.	Additional Terms and Conditions	none
1.	None	

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R012 and P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (note: screening scenario identical to that for P014 and R008) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defin
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.

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IV. Reporting Requirements

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R013 Issuance type: Title V Final Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #6 spray booth with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	87.12 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials
	OAC rule 3745-31-05(D) PTI No. 03-9391	See Section A.I.2.a. 4.49 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 pound particulate emissions (PE)/hour Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A), and 3745-21-07(G)(2).
- b. For purposes of calculating the organic compound emission rates for this emissions unit (R013) and the associated oven (emissions unit P024), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. **Operational Restrictions**

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 87.12 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 4.49 tons.Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The

notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 87.12 pounds OC/day
 - 4.49 tons OC/rolling, 12-month period
 Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in sections A.III.1 and 2 of this permit.
 - b. Emission Limitation:
 - 0.551 pound PE/hour
 Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$
 where:
 - E = PE rate (pounds/hour).
 - TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.
 - CE = Control efficiency of the control equipment (filters).
 If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).
 - c. Emission Limitation:
 - Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
 Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R013 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R014 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #7: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	OAC rule 3745-31-05(A)(3) PTI No. 03-13675	2.55 pounds organic compounds (OC)/hour, 11.17 tons OC/year, from this emissions unit 0.04 pound particulate emissions (PE)/hour, 0.18 ton PE/year, from this emissions unit
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.b. See Section A.I.2.c. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(1)	None (See Section A.II.1.) See Section A.I.2.d.

2. Additional Terms and Conditions

- a. The 2.55 pounds OC/hour and 11.17 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A) and 3745-21-07(G)(2).
- c. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation of 2.55 pounds OC/hour, from the entire line, is a summation of the individual potential to emit OC emission limitations from each component of the line. The two curing ovens contribute 0.023 pound OC/hour and 0.19 pound OC/hour, which are more stringent than the 3 pounds OC/hour and 15 pounds OC/day established by OAC rule 3745-21-07(G)(1).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each coating (i.e., ink, mastic or coating) and cleanup material employed; and
 - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.IV.1 and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

- a. Emission Limitation:

2.55 pounds OC/hour

Applicable Compliance Method:

*The hourly allowable OC emission limitation was established for this emissions unit (the entire dual durometer line) based on the addition of the potentials to emit for OC from each individual component of the line. Emissions unit R014 consists of eight individual components:

- i. Booth #1 - (B1);
- ii. Curing Oven #1 - (CO1);
- iii. Booth #2 - (B2);
- iv. Booth #3 - (B3);
- v. Curing Oven #2 - (CO2);
- vi. Plastic Extrusion - (PE);
- vii. Ink Application - (IA); and
- x. Mastic Application - (MA).

The potential to emit for emissions unit R014 was calculated as follows:

$$PTE = B1 + CO1 + B2 + B3 + CO2 + PE + IA + MA$$

where:

- a. PTE = Potential to Emit for Dual Durometer Line (emissions unit R014), in pounds OC/hour

B1 = OC emissions from Booth #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.90)* = 0.21 pound OC/hour

CO1= OC emissions from Curing Oven #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.10)* = 0.02 pound OC/hour

B2 = OC emissions from Booth #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 0.10 pound OC/gallon) = 0.10 pound OC/hour

B3 = OC emissions from Booth #3, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.90)* = 1.71 pounds OC/hour

CO2 = OC emissions from Curing Oven #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.10)* = 0.19 pound OC/hour

PE = OC emissions from Plastic Extrusion, in pounds OC/hour = (maximum plastic extrusion rate of 150 pounds/hour) x (0.002 pound OC/pound plastic extruded)** = 0.30 pound/hour

IA = OC emissions from Ink Application, in pounds/hour = (maximum ink usage rate of 0.001 gallon/hour) x (maximum OC content of 6.8 pounds OC/gallon) = 0.007 pound OC/hour

MA = OC emissions from Mastic Application, in pounds/hour = (maximum mastic usage rate of 0.64 gallon/hour) x (maximum OC content of 0.0153 pound OC/gallon) = 0.01 pound OC/hour

$$PTE = 0.21 + 0.02 + 0.10 + 1.71 + 0.19 + 0.30 + 0.007 + 0.01 = 2.55 \text{ pounds OC/hour}$$

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- a. *For purposes of determining the OC emission rates between coating operations and the associated oven, the permittee shall utilize a value of 90% as the maximum percentage of the organic compounds employed in the coating operations that are emitted uncontrolled. The remaining 10% of the organic compounds employed shall be considered to be the uncontrolled emissions for the associated oven.
.
**Based on Rubber Manufacturers Association Emission Factors Development Project, Sept. 1996.
- b. Emission Limitation:
11.17 tons OC/year
Applicable Compliance Method:
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760 a, and then dividing by 8760).
- c. Emission Limitation:
0.04 pound PE/hour
Applicable Compliance Method:
Compliance with the hourly PE limitation may be determined by utilizing the following equation:
$$E = (\text{maximum coating solids usage rate, in pounds/hour}) \times (1-TE) \times (1-CE)$$

Where:
E = PE rate, in pounds/hour
TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.
CE = control efficiency of the control equipment
If required, the permittee shall demonstrate compliance in accordance with Methods 1- 5, which is located in 40 CFR Part 60, Appendix A.
- d. Emission Limitation:
0.18 ton PE/year
Applicable Compliance Method:
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 8760).
- e. Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R014 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #7; spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	none	none

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: R015 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #8: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	OAC rule 3745-31-05(A)(3) PTI No. 03-13675	2.55 pounds organic compounds (OC)/hour, 11.17 tons OC/year, from this emissions unit 0.04 pound particulate emissions (PE)/hour, 0.18 ton PE/year, from this emissions unit
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	See Section A.I.2.c. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2)	None (See Section A.II.1.)
	OAC rule 3745-21-07(G)(1)	See Section A.I.2.d.

2. Additional Terms and Conditions

- a. The 2.55 pounds OC/hour and 11.17 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G)(2).
- c. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation of 2.55 pounds OC/hour, from the entire line, is a summation of the individual potential to emit OC emission limitations from each component of the line. The two curing ovens contribute 0.023 pound OC/hour and 0.19 pound OC/hour, which are more stringent than the 3 pounds OC/hour and 15 pounds OC/day established by OAC rule 3745-21-07(G)(1).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each coating (i.e., ink, mastic or coating) and cleanup material employed; and
 - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are

as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.IV.1 and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

a. Emission Limitation:

2.55 pounds OC/hour

Applicable Compliance Method:

*The hourly allowable OC emission limitation was established for this emissions unit (the entire dual durometer line) based on the addition of the potentials to emit for OC from each individual component of the line. Emissions unit R015 consists of eight individual components:

- i. Booth #1 - (B1);
- ii. Curing Oven #1 - (CO1);
- iii. Booth #2 - (B2);
- iv. Booth #3 - (B3);
- v. Curing Oven #2 - (CO2);
- vi. Plastic Extrusion - (PE);
- vii. Ink Application - (IA); and
- x. Mastic Application - (MA).

The potential to emit for emissions unit R015 was calculated as follows:

$$PTE = B1 + CO1 + B2 + B3 + CO2 + PE + IA + MA$$

where:

a. PTE = Potential to Emit for Dual Durometer Line (emissions unit R015), in pounds OC/hour

B1 = OC emissions from Booth #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.90)* = 0.21 pound OC/hour

CO1 = OC emissions from Curing Oven #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.10)* = 0.02 pound OC/hour

B2 = OC emissions from Booth #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 0.10 pound OC/gallon) = 0.10 pound OC/hour

B3 = OC emissions from Booth #3, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.90)* = 1.71 pounds OC/hour

CO2 = OC emissions from Curing Oven #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.10)* = 0.19 pound OC/hour

PE = OC emissions from Plastic Extrusion, in pounds OC/hour = (maximum plastic extrusion rate of 150 pounds/hour) x (0.002 pound OC/pound plastic extruded)** = 0.30 pound/hour

IA = OC emissions from Ink Application, in pounds/hour = (maximum ink usage rate of 0.001 gallon/hour) x (maximum OC content of 6.8 pounds OC/gallon) = 0.007 pound OC/hour

MA = OC emissions from Mastic Application, in pounds/hour = (maximum mastic usage rate of 0.64 gallon/hour) x (maximum OC content of 0.0153 pound OC/gallon) = 0.01 pound OC/hour

PTE = 0.21 + 0.02 + 0.10 + 1.71 + 0.19 + 0.30 + 0.007 + 0.01 = 2.55 pounds OC/hour

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- a. *For purposes of determining the OC emission rates between coating operations and the associated oven, the permittee shall utilize a value of 90% as the maximum percentage of the organic compounds employed in the coating operations that are emitted uncontrolled. The remaining 10% of the organic compounds employed shall be considered to be the uncontrolled emissions for the associated oven.
- **Based on Rubber Manufacturers Association Emission Factors Development Project, Sept. 1996.
- b. Emission Limitation:
11.17 tons OC/year
- Applicable Compliance Method:
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760 a, and then dividing by 8760).
- c. Emission Limitation:
0.04 pound PE/hour
- Applicable Compliance Method:
Compliance with the hourly PE limitation may be determined by utilizing the following equation:
 $E = (\text{maximum coating solids usage rate, in pounds/hour}) \times (1-TE) \times (1-CE)$
- Where:
E = PE rate, in pounds/hour
TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.
CE = control efficiency of the control equipment
- If required, the permittee shall demonstrate compliance in accordance with Methods 1- 5, which is located in 40 CFR Part 60, Appendix A.
- d. Emission Limitation:
0.18 ton PE/year
- Applicable Compliance Method:
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 8760).
- e. Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
- Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R015 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #8: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	none	none

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: R016 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer line #6 spray booth #2	OAC rule 3745-31-05(A)(3) PTI No. 03-8375	27.52 pounds organic compounds (OC)/day, from the use of coatings See Sections A.II.2 and A.II.3.
	OAC rule 3745-21-07(G) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.a. See Section A.II.1. 0.551 pound particulate emissions (PE)/hour Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A), and 3745-21-07(G).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall only employ water-based coating materials in this emissions unit with a maximum OC content of 0.94 pound/gallon.
3. The permittee shall not employ any cleanup material in this emissions unit that will result in OC emissions.
4. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material; and
 - c. documentation on whether or not each cleanup material employed resulted in OC emissions.
2. The permittee shall maintain the following information each day for this emissions unit:
 - a. the quantity of each coating employed, in gallons;
 - b. the OC content of each coating employed, in pounds/gallon;
 - c. the OC emissions for each coating employed, in pounds; and

- d. the total OC emissions for all the coatings employed, in pounds (summation of "c" for all coatings).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-8375, issued on June 21, 1995: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 27.52 pounds and of the OC content limitation of 0.94 pound OC/gallon. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.
4. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying cleanup materials (i.e., cleanup materials that resulted in the emissions of OCs) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.
5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-8375, issued on June 21, 1995: A.IV.1, A.IV.2, A.IV.3 and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

27.52 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily OC emission limitation through the record keeping required in Section A.III.2 of this permit.
 - b. Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-

03(B)(10).

c. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

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

d. OC Content Limitation:

0.94 lb OC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-8375, issued on June 21, 1995: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R016 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: R017 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #6 spray booth #3, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	51.36 pounds organic compounds (OC)/day See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	1.55 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 pound particulate emissions (PE)/hour Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 (B), 3745-17-07(A), and 3745-21-07(G)(2).
- b. For purposes of calculating the OC emission rates for emissions unit R017 and the associated oven P025, the permittee shall utilize a value of 95 percent as the percentage of the OC employed in R017 that are emitted uncontrolled from R017. The remaining 5 percent of the OC employed in R017 shall be considered to be the uncontrolled emissions for P025. This "split" of OC emissions between R017 and P025 is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 51.36 pounds; and

- b. all exceedances of the rolling, 12-month OC emission limitation of 1.55 tons.

Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
- a. Emission Limitations:
- 51.36 pounds OC/day, 1.55 tons OC/year, based on a rolling, 12-month summation.
- Applicable Compliance Method:
- The permittee shall demonstrate compliance with the daily and annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.
- b. Emission Limitation:
- 0.551 pound PE/hour
- Applicable Compliance Method:
- The permittee may calculate actual PE rate from the unit utilizing the following equation:
- $$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$
- where:
- E = PE rate (pounds/hour).
- TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.
- CE = Control efficiency of the control equipment (filters).
- If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
- c. Emission Limitation:
- Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
- Applicable Compliance Method:
- If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R017 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0387020045 Emissions Unit ID: R020 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 durometer extrusion line #5 spray booth with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	35.7 pounds organic compounds (OC)/day See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	4.26 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.551 pound particulate emissions (PE)/hour Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).
- b. For purposes of calculating the OC emission rates for emissions unit R020 and the associated ovens P015, the permittee shall utilize a value of 95 percent as the percentage of the OC employed in R020 that are emitted uncontrolled from R020. The remaining 5 percent of the OC employed in R020 shall be considered to be the uncontrolled emissions for P015. This "split" of OC emissions between R020 and P015 is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

- c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
 4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 35.7 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 4.26 tons.
 Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

35.7 pounds OC/day, 4.26 tons OC/year, based on a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitation through the record keeping required in Sections A.III.1 and 2 of this permit.
 - b. Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R020 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R024 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 durometer extrusion line #9 spray booth #2, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9822	31.2 pounds organic compounds (OC)/day 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year
	OAC rule 3745-31-05(D) PTI No. 03-9822	See Section A.I.2.a. 3.72 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.b. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- c. For purposes of calculating the OC emission rates for emissions units R024 and the associated oven P037, the permittee shall utilize a value of 85 percent as the percentage of the OC employed in R024 that are emitted uncontrolled from R024. The remaining 15 percent of the OC employed in R024 shall be considered to be the uncontrolled emissions for P037. This "split" of OC emissions between R024 and P037 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09822, issued on May 21, 1997: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 31.2 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 3.72 tons.

Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09822, issued on May 21, 1997: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

31.2 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily OC emission limitation through the record keeping required in Section A.III.1 of this permit.
 - b. Emission Limitation:

3.72 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.
 - c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
 - d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09822, issued on May 21, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R024 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R026 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Cascade line #1 spray booth #1	OAC rule 3745-31-05(A)(3) PTI No. 03-9900	77.7 pounds organic compounds (OC)/day 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year
	OAC rule 3745-31-05(D) PTI No. 03-9900	See Section A.I.2.a. 2.85 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.b. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for emissions units R026 and the associated oven P039, the permittee shall utilize a value of 85 percent as the percentage of the OC employed in R026 that are emitted uncontrolled from R026. The remaining 15 percent of the OC employed in R026 shall be considered to be the uncontrolled emissions for P039. This "split" of OC emissions between R026 and P039 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. **Operational Restrictions**

- 1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds;
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;
 - g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and
 - h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.
2. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each cleanup material employed, in gallons;
 - d. the OC content of each cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;
 - g. the number of days the emissions unit was in operation;
 - h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);
 - i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;
 - j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and
 - k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09900, issued on May 21, 1997: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the daily OC emission limitation of 77.7 pounds; and
 - b. all exceedances of the rolling, 12-month OC emission limitation of 2.85 tons.Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09900, issued on May 21, 1997: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. **Testing Requirements**

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

77.7 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily OC emission limitation through the record keeping required in Section A.III.1 of this permit.
 - b. Emission Limitation:

2.85 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.
 - c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
 - d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09900, issued on May 21, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R026 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0387020045 Emissions Unit ID: R029 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #4 - adhesive booth, drying conveyor and flocking booth	OAC rule 3745-31-05(A)(3) PTI No. 03-10454	from adhesive application: 77.1 pounds organic compounds (OC)/day, excluding cleanup material, for emissions units R029 and P044, combined 169 pounds OC/month, from cleanup material usage, for this emissions unit from flocking booth: 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year, for this emissions unit
	OAC rule 3745-31-05(D) PTI No. 03-10454	See Section A.I.2.a. 7.3 tons OC/rolling, 12-month period, from adhesive usage for emissions units R029 and P044, combined
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	0.85 ton OC/rolling, 12-month period, from cleanup material usage for this emissions unit See Section A.I.2.b. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.c.]

2. Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirement of OAC rules 3745-17-07(A) and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for emissions units R029 and P044, combined:
 - a. the company identification for each coating (adhesive) employed;
 - b. the quantity of each coating (adhesive) employed, in gallons;
 - c. the OC content of each coating (adhesive) employed, in pounds/gallon;
 - d. the OC emissions for each coating (adhesive) employed, in pounds (b x c);
 - e. the total OC emissions for all the coatings (adhesives) employed, in pounds (summation of "d" for all coatings);
 - f. the number of days the emissions unit was in operation (when coatings (adhesives) were being applied);

- g. the average daily OC emission rate, in pounds (e/f); and
- h. the total OC emissions per rolling, 12-month period, in tons.

Note: the coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain the following information each month for cleanup materials employed in emissions units R029 and P044, combined:
 - a. the company identification for each cleanup material employed;
 - b. the quantity of each cleanup material employed, in gallons;
 - c. the OC content of each cleanup material employed, in pounds/gallon;
 - d. the OC emissions for each cleanup material employed, in pounds (b x c);
 - e. the total OC emissions for all the cleanup materials employed, in pounds (summation of "d" for all cleanup materials); and
 - f. the total amount of OC emissions per rolling, 12-month period, in tons.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10454, issued on September 10, 1998 (revised July 20, 2004): A.III.1, and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:
 - a. the daily OC emission limitation of 77.1 pounds (excluding cleanup material);
 - b. the monthly OC emission limitation of 169 pounds (from cleanup material usage);
 - c. the rolling, 12-month OC emission limitation of 7.3 tons; and
 - d. the rolling, 12-month OC emission limitation of 0.85 ton (from cleanup usage).

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10454, issued on September 10, 1998 (revised July 20, 2004): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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V. Testing Requirements

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

77.1 pounds OC/day from adhesives

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily allowable OC emission limitation through the record keeping required in Section A.III.1 of this permit.
 - b. Emission Limitation:

7.3 tons OC/rolling, 12-month period from adhesives

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation through the record keeping required in Section A.III.2 of this permit.
 - c. Emission Limitation:

169 pounds OC/month, from cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly allowable OC limitation through the record keeping required in Section A.III.2 of this permit.

d. Emission Limitation:

0.85 ton OC/rolling, 12-month period, from cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC limitation through the record keeping required in Section A.III.2 of this permit.

e. Emission Limitations:

0.10 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

f. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.
3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-10454, issued on September 10, 1998 (revised July 20, 2004): A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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VI. **Miscellaneous Requirements**

1. The OC emissions from emissions units R029 and P044 are generated from the application of coating (adhesive) and cleanup materials. Emissions from rubber curing are based on the emission factor of 0.000825 pound OC/pound of rubber cured, which was obtained from the Rubber Manufacturers Association "Emission Factors Development Project" manual, dated September, 1996. All OC emissions from rubber curing are assumed to be emitted from emissions unit P049.

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Facility ID: 0387020045 Emissions Unit ID: R029 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
flock line #4 - adhesive booth, drying conveyor and flocking booth	none	none
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P044 and R029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 3.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 353
 MAGLC (ug/m3): 10,333

Pollutant: MEK
 TLV (mg/m3): 584
 Maximum Hourly Emission Rate (lbs/hr): 3.04
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 325
 MAGLC (ug/m3): 13,904

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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA

will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0387020045 Emissions Unit ID: R030 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Cascade line #2 spray booth #2	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	2.42 pounds organic compounds (OC)/hour, from the use of coatings
		0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year
	OAC rule 3745-31-05(D) PTI No. 03-13436	See Section A.I.2.a. 6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R009, P055, R030 and P056, combined, from the use of coatings and cleanup materials

OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
OAC rule 3745-21-07(G)	See Section A.II.1.

2. **Additional Terms and Conditions**

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for emissions units R030 and the associated oven P056, the permittee shall utilize a value of 90 percent as the percentage of the OC employed in R030 that are emitted uncontrolled from R030. The remaining 10 percent of the OC employed in R030 shall be considered to be the uncontrolled emissions for P056. This "split" of OC emissions between R030 and P056 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. **Operational Restrictions**

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.
 - c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds; and
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.
2. The permittee shall calculate and record the following information each month for emissions units R009, P055, R030 and P056, combined:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each coating and cleanup material employed, in gallons;
 - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and
 - g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R009, P055, R030 and P056, combined). Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. **Testing Requirements**

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

2.42 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 2.15 pounds OC/gallon and a maximum hourly usage rate of 1.25 gallons/hour for the coatings. A 90 percent/10 percent split between the spray booth and the oven (P056), was applied with 90 percent of the emissions emitted from the spray booth.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:

6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions, for emissions units R009, P055, R030 and P056, combined, from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.
 - c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
 - d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and

cleanup materials employed.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R030 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R031 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Topcoat spray booth - Cascade line #3 spray booth #2, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	2.42 pounds organic compounds (OC)/hour, from the use of coatings 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year
	OAC rule 3745-31-05(D) PTI No. 03-13436	See Section A.I.2.a. 6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R007, P057, R031 and P058, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	See Section A.I.2.b. Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. For purposes of calculating the OC emission rates for emissions units R031 and the associated oven P058, the permittee shall utilize a value of 90 percent as the percentage of the OC employed in R031 that are emitted uncontrolled from R031. The remaining 10 percent of the OC employed in R031 shall be considered to be the uncontrolled emissions for P058. This "split" of OC emissions between R031 and P058 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

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II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the company identification for each coating employed;
 - b. documentation on whether or not each coating employed is a photochemically reactive material.

- c. the quantity of each coating employed, in gallons;
 - d. the OC content of each coating employed, in pounds/gallon;
 - e. the OC emissions for each coating employed (c x d), in pounds; and
 - f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.
2. The permittee shall calculate and record the following information each month for emissions units R007, P057, R031 and P058, combined:
- a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the quantity of each coating and cleanup material employed, in gallons;
 - d. the OC content of each coating and cleanup material employed, in pounds/gallon;
 - e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;
 - f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and
 - g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R007, P057,R031 and P058, combined). Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 2.42 pounds OC/hour, from the use of coatings
 - Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 2.15 pounds OC/gallon and a maximum hourly usage rate of 1.25 gallons/hour for the coatings. A 90 percent/10 percent split between the spray booth and the oven (P058), was applied with 90 percent of the emissions emitted from the spray booth.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:
 - 6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions, for emissions units R007, P057, R031 and P058, combined, from the use of coatings and cleanup materials
 - Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.

c. Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

d. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

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

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0387020045 Emissions Unit ID: R031 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

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

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None