

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for Smetzer's Tire Center located in Wayne County. The sources listed below shall not exceed the emission limits/ control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source No.</u>	<u>Source Identification/ Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rule</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
R001	Tire Cement Booth terms and coating materials Toxics Policy,	Compliance w/ this permit, Ohio EPA Air and use of non-photochemically reactive materials	3745-31-05 from application of	4.13 lbs OC/hr, conditions in
			from all coatings	18.1 TPY of OC
			3745-21-07 (G)	(**)
P900	Tire Buffing System	Compliance w/ terms and conditions in this permit, and Ohio EPA Air Toxics Policy	3745-31-05	1.57 lbs OC/hr, 6.9 Tons OC/year
			3745-17-11 (B)(2)	(*)
			3745-17-07 (A)(1-3)	20% opacity except as provided by rule
P001	Tire Curing Process (Autoclave)	Compliance w/ terms and conditions in this permit and Ohio EPA Air Toxics Policy	3745-31-05	0.2 lb OC/hr, 0.89 Tons OC/year

* The emissions limitations based on this applicable rule are less stringent than the limitations established pursuant to OAC Rule 3745-31-05

** The requirements of OAC Rule 3745-21-07 (G)(2) are not applicable as the permittee only employs non-photochemically reactive materials as defined in OAC Rule 3745-21-01 (C)(5) in this emissions unit.

SUMMARY

Total Permit to Install Allowable Emissions

<u>Pollutant</u>	<u>Tons/Year</u>
PM	3.8
OC	25.89

Additional Special Terms and Conditions

General Information

Smetzer's Tire Center, Inc., a tire retread facility, is proposing to install a new tire cement line, tire buffing line and a new rubber curing process (autoclave). Another new emissions unit is being installed, a boiler, which is exempt by OAC Rule 3745-31-03.

A. Additional Emissions Limitations and/or Control Requirements

There are no additional Emissions Limitations and/or Control Requirements other than those listed in the Air Emissions Summary.

B. Operational Restrictions

1. This permit allows for the use of the coating materials specified by the permittee in the application for PTI number 02-12,561. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation specified in this permit was established in accordance with Ohio EPA's "Air Toxics Policy" and is based on the coating material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for n-hexane based on the Screen3 model and a comparison of the predicted 1-hour maximum ground level concentration to the maximum allowable ground level concentration ("MAGLC"). The following summarizes the results of the modeling for n-hexane and for cadmium:

R001

P900

Pollutant: n-Hexane TLV (microgram/m ³): 176,000 Maximum Hourly Emission Rate (lbs/hr): 4.13 Predicted 1-Hour Max. Concentration (microgram/m ³): 258.6 MAGLC (microgram/m ³): 39,047	Pollutant: Cadmium (*) TLV (microgram/m ³): 9.19 Maximum Hourly Emission Rate (lbs/hr): .000083 Predicted 1-Hour Max. Concentration (microgram/m ³): .10 MAGLC (microgram/m ³): 0.22
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* The permittee performed modeling on all pollutants using an area model. All pollutants complied with their individual MAGLC. Cadmium represents the lowest TLV for all pollutants.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 02-12561 and the operating permit:

- (a) any changes in the composition of the coatings or cleanup materials, or the use

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

(b) any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

(c) any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

(d) Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

2. The permittee shall only employ coating materials in emissions unit R001 which are not photochemically reactive. "Photochemically reactive materials" is defined in OAC Rule 3745-21-01 (C)(5).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record monthly the following information for emissions unit R001 for the purpose of determining annual OC emissions from this emissions unit:
 - (a) The name and identification of each coating material employed;
 - (b) a determination of whether or not the material is photochemically reactive;
 - (c) the OC content of each coating material, in pounds per gallon, as applied;
 - (d) the number of gallons of each coating employed;
 - (e) the OC emission rate in lbs OC/month [c x d];
 - (f) the total OC emissions from all coatings employed in pounds or tons per year, for the calendar year to date [summation of (e)].
2. The permittee shall collect and record monthly the following information for emissions units P004 and P005 for the purpose of determining annual OC emissions from these emissions units:
 - (a) The number of tires produced in tires/month;
3. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and

copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports for emissions units R001, P001 and P900 of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements/Compliance Methods Determination

Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

R001 - Tire Cement Booth

1. **Emission Limitations:**

4.13 lbs OC/hour, 18.1 TPY from all coating materials

Applicable Compliance Method:

The hourly OC limit is based on this emission unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Compliance with the annual OC limit shall be based on the recordkeeping requirements in this permit.

2. Any determination of the OC content*, solids content, or density of a coating material shall be based on the coating material as applied, including the addition of any thinner or viscosity reducer to the coating material. The permittee shall determine the composition of the coating material by formulation data supplied by the manufacturer of the coating material, or from data determined by an analysis of each coating material, as received, by 40 CFR 60, Appendix A, Method 24. The Ohio EPA may require the permittee, if it uses the formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of the coating material by Reference Method 24 or an equivalent or alternative method.

* "OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

P900 - Tire Buffing System

1. Emission Limitation:

1.57 lbs OC/hr, 3.45 TPY

Applicable Compliance Method:

The hourly OC limit is based on this emission unit's potential to emit (based on maximum hourly production rate of [x lbs rubber processed/hr]) using calculations done in accordance with the Rubber Manufacturers Association (RMA) Emission Factors Development Project, September, 1996 (draft AP-42 Section 14.12). Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

2. Emission Limitation:

0.87 lbs PM/hr, 3.8 TPY

Applicable Compliance Method:

The Permittee shall demonstrate compliance with the hourly and annual limits by the following calculation:

$$(T_h)(R)(P_s)(P_e) = \text{lbs PE/hour}$$

$$(\text{lbs PE/hour})/(\# \text{ operating hours/year})(1 \text{ ton}/2000 \text{ lbs}) = \text{tons PE/yr}$$

Where:

T_h = # of tires per hour

R = lbs/tire rubber ground off

P_s = percentage of rubber suspended in air

P_e = percentage of suspended particulate emitted

If required, the permittee shall demonstrate compliance with the above limitations by U.S. EPA Method 5, which is located in 40 CFR Appendix A.

3. Emission Limitation:

20% opacity except as provided by rule.

Applicable Compliance Method:

OAC 3745-17-03(B)(1), if required.

P001 - Tire Curing Process (Autoclave)

1. Emission Limitation:

0.2 lb OC/hr, 0.89 TPY

Applicable Compliance Method:

The hourly OC limit is based on this emission unit's potential to emit (based on maximum hourly production rate of [x lbs rubber cured/hr]) using calculations done in accordance with the Rubber Manufacturers Association (RMA) Emission Factors Development Project, September, 1996 (draft AP-42 Section 14.12). Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Note: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. Miscellaneous Requirements

None