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Facility Name: **Cooper Tire & Rubber Company**

Application Number: **03-3101**

Date: **January 27, 1999**

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

#### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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**BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **Cooper Tire & Rubber Company**Application Number: **03-3101**Date: **January 27, 1999**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Cooper Tire & Rubber Company** located in **Hancock** County. The emissions units 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 Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P151	White Sidewall Buffer with Wet Cyclone (WSW #7)	Compliance with Permit Allowable Emission Rate & Use of Wet Cyclone	3745-31-05	4.80 lbs PE/day; 0.90 ton PE/yr
				7.20 lbs VOC/day; 1.31 tons VOC/yr
			3745-17-07	20% opacity as a six-minute average
			3745-17-11	*
P152	Tire Uniformity Optimizer with Cyclone (TUO #14)	Compliance with Permit Allowable Emission Rate & Use of Cyclone	3745-31-05	2.16 lbs PE/day; 0.39 ton PE/yr
				2.16 lbs VOC/day; 0.39 ton VOC/yr
			3745-17-07	20% opacity as a six-minute average
			3745-17-11	*
P153	Tire Uniformity Optimizer with Cyclone (TUO #15)	Compliance with Permit Allowable Emission Rate & Use of Cyclone	3745-31-05	2.16 lbs PE/day; 0.39 ton PE/yr
				2.16 lbs VOC/day; 0.39 ton VOC/yr

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P153 cont'd			3745-17-07	20% opacity as a six-minute average
			3745-17-11	*

\* The limits established in accordance with OAC 3745-31-05 are more stringent than those established by 3745-17-11.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PE	1.68
VOC	2.09

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**INTRODUCTION**

PTI #03-13101 serves to permit one white sidewall buffer (emissions unit P151) and two tire uniformity optimizers (emissions units P152 and P153) at the Cooper Tire & Rubber Company in Findlay, Ohio. Cooper Tire is a major facility for Title V.

Air toxics modeling was not performed because the pollutants emitted by emissions units P151, P152, and P153 do not have a Threshold Limit Value (TLV) exceeding one (1) ton per year, as listed in the 1996 edition of the American Conference of Governmental Industrial Hygienists (ACGIH) booklet.

HAP emissions from emissions units P152 and P153 are negligible and therefore are not included in the permit.

Note: Emissions unit P151 was previously permitted as emissions unit P142 under PTI #03-8554. However, the emissions unit was never installed and the PTI has since expired.

**A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS**

1. Visible emissions from emissions units P151, P152, and P153 shall not exceed 20% opacity as a six-minute average.

**B. OPERATIONAL RESTRICTIONS**

1. The pressure drop across the wet scrubber shall be maintained within the range of 6 - 8 inches of water while emissions unit P151 is in operation.
2. The permittee shall not exceed 25% as a maximum daily grinding rate for emissions units P152 and P153. [Note: The process weight rate for emissions units P152 and P153 is directly related to the amount of tires that require a uniformity correction and may therefore fluctuate accordingly.]

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**C. MONITORING AND RECORDKEEPING REQUIREMENTS**

1. The permittee shall maintain monthly records summarizing the total number of days during which the maximum number of tires ground by emissions unit P151 exceeded 4800 tires.
2. The permittee shall maintain monthly records summarizing the total number of days during which the maximum daily grind rate exceeded 25% in emissions units P152 and P153.
3. All records shall be maintained at the facility for a period of not less than five years and shall be made available to personnel from the Ohio EPA, Northwest District Office, for review during normal business hours.

**D. REPORTING REQUIREMENTS**

1. The permittee shall submit quarterly written reports summarizing the following:
  - a. any deviations (excursions) from emission limitations and operational restrictions that have been detected by testing, monitoring, and record keeping requirements specified in this permit;
  - b. each day during which the maximum number of tires processed by emissions unit P151 exceeded 4800 tires;
  - c. each day during which the total grinding rate exceeded 25%;
  - d. the probable cause of such deviations; and,
  - e. any corrective actions or preventive measures that have been or will be taken.

If no deviations occurred during the calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

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The reports shall be submitted 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). All reports shall be submitted to the Northwest District Office.

**E. TESTING REQUIREMENTS**

1. Compliance Methods Requirements: Compliance with the emission limitations shall be determined in accordance with the following method(s):

**EMISSIONS UNIT P151**

- a. Emission Limitation: - 4.80 lbs PE/day and 0.90 ton PE/year

Applicable Compliance Method: - Compliance with the PE emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10). In the absence of Ohio EPA requiring such testing, the permittee may calculate emissions utilizing stack data from an identical unit.

- b. Emission Limitation: - 7.20 lbs VOC/day and 1.30 tons VOC/year

Applicable Compliance Method: Compliance with the above emission limitations shall be determined by the following equation:

$$E = T \times PE \times EF$$

where

E = VOC emission rate (lbs/day or tons/year)

T = Maximum amount of tires that enter the buffer (200 tires/hour)

PE = Particulate emission rate of 0.10 lb PE (LB rubber removed)/tire buffed (based on stack test of similar unit)

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EF = RMA emission factor - 1.59E-02 lb VOC/lb  
rubber removed

**\* Multiply the above equation by 1 ton/2000 lbs  
to convert to tons per year**

**EMISSIONS UNITS P152 and P153**

- c. Emission Limitation: - 25% maximum daily grinding  
rate (for each emissions unit)

Applicable Compliance Method: Compliance shall be  
based upon the recordkeeping and reporting  
requirements specified in C.3 of these terms and  
conditions.

- d. Emission Limitation: - 2.16 lbs PE/day and 0.39 ton  
PE/year (for each emissions unit)

Applicable Compliance Method: Compliance with the  
PE Emissions shall be determined in accordance with  
the test method and procedures in OAC rule 3745-17-  
03 (B)(10). In the absence of Ohio EPA requiring  
such testing, the permittee may calculate emissions  
utilizing stack data from an identical unit.

- e. Emission Limitation: 2.16 lbs VOC/day and 0.39 ton  
VOC/year (for each emissions unit)

Applicable Compliance Method: Compliance with the  
above emission limitations shall be determined by  
the following equation:

$$E = T \times PE \times EF$$

where

E = VOC emission rate (lbs/day or tons/year)

T = Maximum amount of tires that pass through  
optimizer (180 tires/hour)

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PE = Particulate emission rate of 0.05 lb PE (LB rubber removed)/tire

% = Percentage of total tires that receive a niformity correction

EF = RMA emission factor - 3.81E-02 lb VOC/lb rubber removed

**\* Multiply the above equation by 1 ton/2000 lbs to convert to tons per year**

**EMISSIONS UNITS P151, P152, AND P153**

f. Emission Limitation: - 20% opacity as a six-minute average

Applicable Compliance Method: OAC rule 3745-17-03(B)(3)

**F. MISCELLANEOUS REQUIREMENTS**

None