OhioEPA

State of Ohio Environmental Protection Agency

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

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

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

RE: FINAL PERMIT TO INSTALL
PORTAGE COUNTY
Application No: 16-01884

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
X	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: February 16, 2000

White Rubber Corporation
Linsey Sargent
PO Box 230
Ravenna, OH 44266

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: USEPA
AKRON REGIONAL AIR QUALITY MANAGEMENT

FINAL PERMIT TO INSTALL 16-01884

Application Number:	16-01884
APS Premise Number:	1667060021
Permit Fee:	**$400**
Name of Facility:	White Rubber Corporation
Person to Contact:	Linsey Sargent
Address:	PO Box 230
	Ravenna, OH 44266

Location of proposed air contaminant source(s) [emissions unit(s)]:
835 North Cleveland Road
Ravenna, **Ohio**

Description of proposed emissions unit(s):
LINEMAN'S RUBBER SLEEVE DIPPING PROCESS CONSISTING OF 10 MIXERS, 3 STORAGE TANKS, 16 DIP TANKS, 32 DIP MACHINES.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11

below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.**
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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. 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Organic Compounds	39.6

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Rubber sleeve dipping line, consisting of 32 dip machines, and 16 dip tanks, and a sleeve drying room. Controlled by a 10,000 cfm carbon adsorber capable of 95% control efficiency. The adsorber includes an integral condenser and scrubber. [Note: the carbon adsorber is shared by portions of Emissions unit P003]	OAC rule 3745-21-07(G) OAC rule 3745-21-11	The use of only nonphotochemically reactive materials. The installation, and operation of a carbon adsorber unit (CAU) with at least a 95% Control efficiency. A permanent total enclosure.

2. Additional Terms and Conditions

2.a The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2.b The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure

operational restriction, monitoring, record keeping, and reporting requirements specified

below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified in Section A.I.2.b to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

1. The Emissions unit shall employ only nonphotochemically reactive materials and cleanup solvents.

Carbon adsorber operational restriction

2. The total mass steam flow rate from the carbon adsorber, for any carbon bed regeneration cycle, shall not be more than 10 percent below the minimum total mass steam flow rate for any regeneration cycle during the most recent emission test that demonstrated the emissions unit was in compliance.

Permanent Total Enclosure Operational Restriction

3. The PTE shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

Carbon adsorber monitoring and Record keeping requirements

1. The permittee shall operate and maintain a continuous monitor and recorder which measures and records the steam flow rate from the carbon adsorber serving P006. The monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modification deemed necessary by the permittee.

   The permittee shall collect and record the following information each day:

   (a) The total mass steam flow rate from the carbon adsorber during each carbon bed regeneration cycle.

   (b) A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit(s).

Permanent Total Enclosure Monitoring and Record keeping Requirements

2. The permittee shall install, maintain and operate monitoring devices and a recorder (if necessary) which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modification deemed necessary by the permittee..

3. The permittee shall record and maintain the following information on a daily basis:

   a. The difference in pressure between the PTE and the surrounding area(s).

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

4. The permittee shall collect and record the following information for each month for the emissions unit:

   a. the company identification for each solvent employed; and,

   b. documentation on whether or not each solvent is a photochemically reactive material;

IV. Reporting Requirements

Carbon adsorber reporting requirements

1. The permittee shall submit total mass steam flow rate deviation (excursion) reports that identify all carbon bed regeneration cycles during which the total mass flow steam rates were less than the total mass flow steam rate limitation specified above.

Permanent Total Enclosure Reporting Requirements

2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.

3. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

4. The permittee shall submit annual reports on or before January 30 of each year that identify each month during which photochemically reactive materials were employed, and the actual organic compound emission rate for each such month.

5. The deviation reports shall be submitted in accordance with the requirements specified in Part I-2 of the General Term and Condition of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   1.a Operational Restriction

   use of a total enclosure, and carbon adsorber that is 95% efficient.

   Applicable Compliance Method:

   See V.2. Below.

   1.b Operational Restriction Limitation:

   Use of only nonphotochemically reactive materials

   Applicable Compliance Method:

   In accordance with section B.III, monthly records shall be maintained of the identification of each liquid organic compound employed (emitted) and whether or not each liquid organic compound is a photochemically reactive material. In addition, for emission fee purposes, monthly records shall be maintained of the organic compound content of each liquid organic compound employed, the monthly usage of each liquid organic compound employed, and the calculated monthly organic compound emission rate for all liquid organic compound employed. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each liquid organic compound.

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

   a. The emission testing shall be conducted within 6 months after issuance of the permit.

   b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency requirements, and the mass emission limitation for organic compounds.

   c. The following test method(s) shall be employed to demonstrate compliance with the allowable organic compound mass emission limitation(s): 40 CFR Part 60, Appendix A, Method 18, Method 25 or Method 25A, as appropriate. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency requirements are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18, Method 25 or Method 25A, as appropriate. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

VI. Miscellaneous Requirements

1. The terms and conditions of this permit to install (PTI) supersede the terms and conditions of all previous permits issued for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Rubber sleeve dipping line, consisting of 32 dip machines, and 16 dip tanks, and a sleeve drying room. Controlled by a 10,000 cfm carbon adsorber capable of 95% control efficiency . The adsorber includes an integral condenser and scrubber. [Note: the carbon adsorber is shared by portions of Emissions unit P003]	OAC rule 3745-31-05	9.04 pounds per hour Organic Compounds. 39.60 tons per year Organic Compounds.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

2. The permittee shall collect and record the following information for each month for the emissions

unit:

a. the company identification for each solvent employed;

b. the number of gallons of each solvent employed;

c. the organic compound content of each solvent, in pounds per gallon;

d. the organic compound emission rate for each solvent, in pounds or tons per month;

e. the total organic compound controlled emission rate for all solvents, in pounds or tons per month;

f. The total number of hours the emissions unit was in operation during the month; and

g. The average hourly organic compound emission rate for all solvents, i.e., [(f)/(g)], in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 9.04 pounds per hour, and the actual average hourly organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   1.a Emission Limitation:

   9.04 pounds per hour Organic Compounds.
   39.60 tons per year Organic Compounds.

   Applicable Compliance Method:

   In accordance with section B.III, monthly records shall be maintained of the identification of each liquid organic compound employed (emitted) In addition, for emission fee purposes, monthly records shall be maintained of the organic compound content of each liquid organic compound employed, the monthly usage of each liquid organic compound employed, and the calculated monthly organic compound emission rate for all liquid organic compound employed. Formulation data or USEPA Method 24 shall be used to determine the organic

compound content of each liquid organic compound.

VI. Miscellaneous Requirements

1. This permit allows the use of the liquid organic compounds and cleanup materials specified by the permittee in the PTI 16-1884 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup 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 each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: VM&P Naphtha

   TLV (ug/m3): 1,370,000

   Maximum Hourly Emission Rate (lbs/hr): 9.04

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,360

   MAGLC (ug/m3): 32,619

   As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

   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);

   c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

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" as defined in OAC rule 3745-77-01(V).

For 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, the permittee shall obtain a permit to install prior to the change.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Rubber sleeve mixing room, consisting of 10, 90 gallon mixers, and 3 transfer tanks.	OAC rule 3745-21-07(G)	The use of only nonphotochemically reactive materials.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The Emissions unit shall employ only nonphotochemically reactive materials and cleanup solvents.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the emissions unit:

   a. the company identification for each solvent employed;

   b. documentation on whether or not each solvent is a photochemically reactive material;

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. The identification of each day a photochemically reactive material or cleanup solvent was used.

   b. The amount of photochemically reactive material or cleanup solvent employed.

2. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the

General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Operational Restriction Limitation:

Use of only nonphotochemically reactive materials

Applicable Compliance Method:

In accordance with section B.III, monthly records shall be maintained of the identification of each liquid organic compound employed (emitted) and whether or not each liquid organic compound is a photochemically reactive material. In addition, for emission fee purposes, monthly records shall be maintained of the organic compound content of each liquid organic compound employed, the monthly usage of each liquid organic compound employed, and the calculated monthly organic compound emission rate for all liquid organic compound employed. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each liquid organic compound.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Rubber sleeve mixing room, consisting of 10, 90 gallon mixers, and 3 transfer tanks.	OAC rule 3745-31-05	1.52 pounds per hour Organic Compounds. 6.66 tons per year Organic Compounds.

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The Emissions unit shall employ only nonphotochemically reactive materials and cleanup solvents.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for the emissions unit:

   a. the company identification for each solvent employed;

   b. the number of gallons of each solvent employed;

   c. the organic compound content of each solvent, in pounds per gallon;

   d the organic compound emission rate for each solvent, in pounds or tons per month;

   e. the total organic compound controlled emission rate for all solvents, in pounds or tons per month;

   f. the total number of hours the emissions unit was in operation during the month; and

g. the average hourly organic compound emission rate for all solvents, i.e., [(f)/(g)], in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 1.52 pounds per hour, and the actual average hourly organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   1.a Emission Limitation:

   1.52 pounds per hour Organic Compounds.
   6.66 tons per year Organic Compounds.

   Applicable Compliance Method:

   In accordance with section B.III, monthly records shall be maintained of the identification of each liquid organic compound employed (emitted) In addition, for emission fee purposes, monthly records shall be maintained of the organic compound content of each liquid organic compound employed, the monthly usage of each liquid organic compound employed, and the calculated monthly organic compound emission rate for all liquid organic compound employed. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each liquid organic compound.

VI. Miscellaneous Requirements

1. This permit allows the use of the liquid organic compounds and cleanup materials specified by the permittee in the PTI 16-1884 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup 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 each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: VM&P Naphtha

TLV (ug/m3): 1,370,000

Maximum Hourly Emission Rate (lbs/hr): 9.04

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,360

MAGLC (ug/m3): 32,619

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

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);

c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

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" as defined in OAC rule 3745-77-01(V).

For 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" axs defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.