John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/6/2013

Certified Mail

Ken Kontely
Veyance Technologies, Inc.
13601 Industrial Parkway
Marysville, OH 43040

Facility ID: 0180010013
Permit Number: P0083904
County: Union

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 9/27/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Central District Office

Response to Comments

Facility ID:	0180010013
Facility Name:	Veyance Technologies, Inc.
Facility Description:	Rubber and plastics hose and belting.
Facility Address:	13601 Industrial Parkway Marysville, OH 43040 Union County
Permit:	P0083904, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Marysville Tribune on 10/01/2013. The comment period ended on 10/31/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

On October 8, 2013, comments were received from August Mack Environmental, Inc. The comments and response to comments are provided below.

August Mack Environmental, Inc.'s Comments:

1. In the statement of basis document, replace B007 with B013 in the list of emissions units subject to 40 CFR Part 63, Subpart DDDDD.

   This change has been made.

2. In the statement of basis document, correct the following typographical errors.

a. Added 40 CFR Part 63, Subpart DDDD and 40 CFR Part 63, Subpart ZZZZ applicability to the insignificant emissions units list ~~and~~as well as permit-by-rule applicability for B006 (PBR 06025) and B007 (PBR 10964).

b.

P015	VOC: ~~50~~40lb/day

These changes have been made.

3. In Section B. Facility-Wide Terms and Conditions, paragraph 4., why are other insignificant emissions units not included in this list like waste oil pumps etc.?

   This list contains only those insignificant emissions units that are subject to a rule requirement and/or a permit-to-install. This list was created based on information provided by the facility. According to Veyance Technologies, Inc., the waste oil pumps are not sources of combustion, are considered "de minimis" under OAC rule 3745-15-05 and are not subject to any rule requirements, including the requirement to obtain a permit-to-install.

4. In the testing requirements section for the lb/MMBtu emissions limitations established for emissions units B001, B004 and B005, please revise the applicable compliance method language to make it more generic without including the specific numbers.

   These changes have been made.

5. Emissions unit P021 should be identified as Hot-Former Line instead of Roller Die Line.

   This change has been made.

6. Can the annual reporting requirement for emissions unit P021 be included in the quarterly deviation reports?

   Yes.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Veyance Technologies, Inc.

Facility ID:	0180010013
Permit Number:	P0083904
Permit Type:	Renewal
Issued:	11/6/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Veyance Technologies, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 15
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 19
1. Emissions Unit Group -Boilers #1 & #2: B001, B004 20
2. B005, Boiler #3 25
3. P003, Cover Calender 30
4. P004, Fabric Calender 32
5. P015, Belt Repair Cements & Solvents 34
6. P017, Belt Dusters 36
7. P018, Rodex 39
8. P021, Hot-Former Line 40
9. Emissions Unit Group –Curing Presses: P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P019, P020 45

Authorization

Facility ID:	0180010013
Facility Description:	Rubber and plastics hose and belting.
Application Number(s):	A0014356, A0014357, A0014358, A0043509, A0043846, A0047831
Permit Number:	P0083904
Permit Description:	Title V renewal permit
Permit Type:	Renewal
Issue Date:	11/6/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0083903

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Veyance Technologies, Inc.
13601 Industrial Parkway
Marysville, OH 43040

Ohio Environmental Protection Agency (EPA)District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, 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:

(1) 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.

(2) 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 paragraph (E) of OAC rule 3745-77-03.

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

(4) 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 Ohio EPA DAPC, Central District Office 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:

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

(2) 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Central District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio

EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed

basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ: B006 and B007. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gpoaccess.gov or by contacting the Ohio EPA, Central District Office.

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart DDDDD: B001, B003, B004, B005 and B013. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gpoaccess.gov or by contacting the Ohio EPA, Central District Office.

4. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

B003	Fire Pump House Boiler	40 CFR Part 63, Subpart DDDDD
B006	Emergency Generator	PBR 06025 and 40 CFR Part 63, Subpart ZZZZ
B007	Emergency water pump - 243 HP - distillate oil	PBR 10964 and 40 CFR Part 63, Subpart ZZZZ
B008	#1 Make-Up Air Unit (space heater)	
B009	#2 Make-Up Air Unit (space heater)	
B010	#3 Make-Up Air Unit (space heater)	
B011	#4 Make-Up Air Unit (space heater)	
B012	#5 Make-Up Air Unit (space heater)	
B013	0.825 MMBtu/hr natural gas-fired boiler	40 CFR Part 63, Subpart DDDDD

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Boilers #1 & #2: B001, B004

EU ID	Operations, Property and/or Equipment Description
B001	21.7 MMBtu/hr boiler used for both non-contact process steam and heating, using No. 6 fuel oil or natural gas
B004	21.0 MMBtu/hr boiler used for both non-contact process steam and heating, using No. 6 fuel oil or natural gas

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	When burning natural gas, particulate emissions shall not exceed 0.020 lb/MMBtu of actual heat input.
c.	OAC rule 3745-17-10(C)(1)	When burning No. 6 fuel oil, particulate emissions shall not exceed 0.32 lb/MMBtu of actual heat input.
d.	OAC rule 3475-18-06(D)	When burning No. 6 fuel oil, sulfur dioxide emissions shall not exceed 1.6 lb/MMBtu of actual heat input.
e.	40 CFR Part 63, Subpart DDDDD	See b)(2)a. and b)(2)b. below.
f.	40 CFR Part 63, Subpart A	See b)(2)c. below.

(2) Additional Terms and Conditions

a. This emissions unit shall be operated in accordance with the definition of a "unit designed to burn gas 1 subcategory" pursuant to 40 CFR 63.7575 as follows. "*Unit designed to burn gas 1 subcategory* includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and

process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition."

b. The work practice standards that apply to this emissions unit are identified in Table 3 to Subpart DDDDD of 40 CFR Part 63 - "Work Practice Standards".

c. Table 10 to Subpart DDDDD of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart DDDDD of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall burn only natural gas or No. 6 fuel oil in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

(2) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

[OAC rule 3745-18-06(D) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart A]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or No. 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(A)(3)]

(2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director (the Ohio EPA, Central District Office).

[OAC rule 3745-18-04(E)(3), OAC rule 3745-18-04(I) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

(4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart A]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(A)(3)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when a fuel other than natural gas and/or No. 6 fuel oil was burned in this emissions unit; and

b. anyexceedance of the allowable sulfur dioxide emission limitation, pounds sulfur dioxide/MMBtu actual heat input.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart A]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

When burning natural gas, particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 1.9lbPE/10^6scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10^6scf natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

b. Emission Limitation:

When burning No. 6 fuel oil, particulate emissions shall not exceed 0.32 lb/MMBtu of actual heat input.

Applicable Compliance Method:

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (5/10). Compliance with the lb/MMBtu emission limitation may be determined by converting the (9.19(S)+3.22 lb of particulates/1,000 gal) No. 6 fuel oil emission factor into lbPE/MMBtu by dividing by 150 MMBtu/1,000 galNo. 6 fuel oil.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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).

d. Emission Limitation:

When burning No. 6 fuel oil, sulfur dioxide emissions shall not exceed 1.6 lb/MMBtu actual heat input.

Applicable Compliance Method:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

2. B005, Boiler #3

Operations, Property and/or Equipment Description:

29.3 MMBtu/hr boiler used for both non-contact process steam and heating, using No. 6 fuel oil or natural gas

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	When burning natural gas, particulate emissions shall not exceed 0.020 lb/MMBtu of actual heat input.
c.	OAC rule 3745-17-10(C)(1)	When burning No. 6 fuel oil, particulate emissions shall not exceed 0.29lb/MMBtu of actual heat input.
d.	OAC rule 3475-18-06(D)	When burning No. 6 fuel oil, sulfur dioxide emissions shall not exceed 1.6 lb/MMBtu of actual heat input.
e.	OAC rule 3745-31-05(A)(3) (PTI 01-055)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-17-10(C)(1) and 3745-18-06(D).
f.	40 CFR Part 63, Subpart DDDDD	See b)(2)a. and b)(2)b. below.
g.	40 CFR Part 63, Subpart A	See b)(2)c. below.

(2) Additional Terms and Conditions

a. This emissions unit shall be operated in accordance with the definition of a "unit designed to burn gas 1 subcategory" pursuant to 40 CFR 63.7575 as follows. "*Unit designed to burn gas 1 subcategory* includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel,

maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition."

b. The work practice standards that apply to this emissions unit are identified in Table 3 to Subpart DDDDD of 40 CFR Part 63 - "Work Practice Standards".

c. Table 10 to Subpart DDDDD of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart DDDDD of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall burn only natural gas or No. 6 fuel oil in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

(2) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

[OAC rule 3745-18-06(D) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart A]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or No. 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(A)(3)]

(2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director (the Ohio EPA, Central District Office).

[OAC rule 3745-18-04(E)(3), OAC rule 3745-18-04(I) and OAC rule 3745-77-07(A)(3)]

(3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

(4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart A]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(A)(3)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when a fuel other than natural gas and/or No. 6 fuel oil was burned in this emissions unit; and

b. anyexceedance of the allowable sulfur dioxide emission limitation, pounds sulfur dioxide/MMBtu actual heat input.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart A]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

When burning natural gas, particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 1.9lbPE/10^6scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10^6scf natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

b. Emission Limitation:

When burning No. 6 fuel oil, particulate emissions shall not exceed 0.29 lb/MMBtu of actual heat input.

Applicable Compliance Method:

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (5/10). Compliance with the lb/MMBtu emission limitation may be determined by converting the (9.19(S)+3.22 lb of particulates/1,000 gal) No. 6 fuel oil emission factor into lbPE/MMBtu by dividing by 150 MMBtu/1,000 galNo. 6 fuel oil.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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).

d. Emission Limitation:

When burning No. 6 fuel oil, sulfur dioxide emissions shall not exceed 1.6 lb/MMBtu actual heat input.

Applicable Compliance Method:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

3. P003, Cover Calender

Operations, Property and/or Equipment Description:

Cover calendar, coating fabric with uncured rubber and associated mills

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0115103)	Volatile organic compound (VOC) emissions shall not exceed 1.57 pounds per hour and 6.89 tons per year. See b)(2)a. below.

(2) Additional Terms and Conditions

a. The hourly and annual VOC limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Volatile organic compound (VOC) emissions shall not exceed 1.57 pounds per hour and 6.89 tons per year.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated using the following equation and the highest emissions factors provided in the Draft AP-42 Section 4.12 Manufacture of Rubber Products (November 2008).

VOC = Rubber Throughput x ($EF_{calendaring}$ + $EF_{milling}$), where

Rubber Throughput = 9,310 lb/hr (P003's maximum hourly rubber throughput)
$EF_{calendaring}$= 5.59E-05 lb/lb rubber
$EF_{milling}$= 1.13E-04 lb/lb rubber

Compliance with the annual VOC emissions limitation shall be demonstrated by multiplying the maximum hourly emissions by 8,760 hours per year and dividing by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

4. P004, Fabric Calender

Operations, Property and/or Equipment Description:

Fabric calendar, coating fabric with uncured rubber and associated equipment

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0115103)	Volatile organic compound (VOC) emissions shall not exceed 0.39 pound per hour and 1.72 tons per year. See b)(2)a. below.

(2) Additional Terms and Conditions

a. The hourly and annual VOC limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Volatile organic compound (VOC) emissions shall not exceed 0.39 pound per hour and 1.72 tons per year.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated using the following equation and the highest emissions factors provided in the Draft AP-42 Section 4.12 Manufacture of Rubber Products (November 2008).

VOC = Rubber Throughput x ($EF_{calendaring}$ + $EF_{extruding}$), where

Rubber Throughput = 5,755 lb/hr (P004's maximum hourly rubber throughput)
$EF_{calendaring}$= 5.59E-05 lb/lb rubber
$EF_{extruding}$= 1.24E-05 lb/lb rubber

Compliance with the annual VOC emissions limitation shall be demonstrated by multiplying the maximum hourly emissions by 8,760 hours per year and dividing by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

5. P015, Belt Repair Cements & Solvents

Operations, Property and/or Equipment Description:

belt repair, use of cement and solvents

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0108399)	Volatile organic compound (VOC) emissions shall not exceed 40 pounds per day and 7.3 tons per year. See b)(2)a. below.

(2) Additional Terms and Conditions

a. The daily emission limitationis greater than the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a quarterly basis:

a. The name and identification for each solvent and cement employed.

b. The number of gallons of each solvent and cement employed.

c. The VOC content of each solvent and cement, in pounds per gallon.

d. The total VOC emissions for all solvents and cements employed, in pounds or tons, that is the sum of all solvents and cements times the respective VOC content.

[OAC rule 3745-77-07(A)(3)]

(2) The permittee shall calculate and record the total annual VOC emissions from all solvents and cements employed by summing the quarterly records in d)(1) above.

[OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 40 pounds per day.

Applicable Compliance Method:

The daily emission limitationis greater than the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this emission limitation.

b. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the recordkeeping requirements specified in d) above.

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the solvents and cements.

g) Miscellaneous Requirements

(1) None.

6. P017, Belt Dusters

Operations, Property and/or Equipment Description:

Belt duster

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0108399)	Particulate emissions shall not exceed 7.86 pounds per hour and 34.42 tons per year. There shall be no visible particulate emissions from this emissions unit. See b)(2)a. and b)(2)b. below.

(2) Additional Terms and Conditions

a. The particulate emissions limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limitations.

b. Emissions were calculated for particulate less than 22 microns because larger particles are assumed to settle within the plant.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

There shall be no visible particulate emissions from this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

b. Emissions Limitation:

Particulate emissions shall not exceed 7.86 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by the maximum potential to emit calculations supplied by the permittee:

63,866,400 sq.ft of belt dusted; 704,000 lb of dust purchased; 0.0041587 lb dust remaining on belt/sq.ft (from weighing of samples before and after dusting)

704,000 lb dust purchased - (63,866,400 x 0.0041587) = 438,400 lb dust lost/yr

(438,400 x 0.1226 (for percentage particulate below 22 microns)) / 6,838 hr/yr = 7.86 lb/hr

c. Emissions Limitation:

Particulate emissions shall not exceed 34.42 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the maximum potential to emit calculations supplied by the permittee:

63,866,400 sq.ft of belt dusted; 704,000 lb of dust purchased; 0.0041587 lb dust remaining on belt/sq.ft (from weighing of samples before and after dusting)

704,000 lbs dust purchased - (63,866,400 x 0.0041587) = 438,400 lb dust lost/yr

(438,400 x 0.1226 (for percentage particulate below 22 microns)) / 6,838 hr/yr = 7.86 lb/hr

7.86 lb/hr x 8,760 hr/yr x (1 ton/2,000 lb) = 34.42 ton/yr

g) Miscellaneous Requirements

(1) None.

7. P018, Rodex

Operations, Property and/or Equipment Description:

Roller die extruder & associated mills used to produce a flat sheet of rubber

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	None.	None.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. None.

g) Miscellaneous Requirements

(1) None.

8. P021, Hot-Former Line

Operations, Property and/or Equipment Description:

Roller Die Extruder Line: Extruder, Calender (Roller Die), Paint Station Dryer.

a) 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) b)(1)b., d)(1) through d)(4) and e)(2)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0115103)	Volatile organic compound (VOC) emissions shall not exceed 1.7 pounds per hour and 7.4 tons per year. See b)(2)a. below.
b.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See d)(1) through d)(4) below.

(2) Additional Terms and Conditions

a. The hourly and annual VOC limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The PTI application for this emissions unit, P021, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The

predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   $$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons per year) or "worst case" toxic contaminant(s):

   Toxic Contaminant: methyl isobutyl ketone
   TLV (mg/m^3): 204.8
   Maximum Hourly Emission Rate (lb/hr): 2.9
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 45.41
   MAGLC (ug/m^3): 4,857

The permittee, has demonstrated that emissions of methyl isobutyl ketone, from emissions unit P021, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and F(4)], Option A, Engineering Guide #70

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” 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 a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTIprior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and F(4)], Option A, Engineering Guide #70

(3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and F(4)], Option A, Engineering Guide #70

(4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and F(4)], Option A, Engineering Guide #70

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(A)(3)]

(2) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01] and Option A, Engineering Guide #70

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Volatile organic compound (VOC) emissions shall not exceed 1.7 pounds per hour and 7.4 tons per year.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated using the following equation and the highest emissions factors provided in the Draft AP-42 Section 4.12 Manufacture of Rubber Products (November 2008).

VOC = Rubber Throughput x ($EF_{calendaring}$ + $EF_{extruding}$), where

Rubber Throughput = 24,802 lb/hr (P021's maximum hourly rubber throughput)
$EF_{calendaring}$= 5.59E-05 lb/lb rubber
$EF_{extruding}$= 1.24E-05 lb/lb rubber

Compliance with the annual VOC emissions limitation shall be demonstrated by multiplying the maximum hourly emissions by 8,760 hours per year and dividing by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group –Curing Presses: P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P019, P020

EU ID	Operations, Property and/or Equipment Description
P005	Curing Press No. 1
P006	Curing Press No. 2
P007	Curing Press No. 3
P008	Curing Press No. 4
P009	Curing Press No. 5
P010	Rotocure Press No. 1
P011	Rotocure Press No. 2
P012	Rotocure Press No. 3
P013	Repair Press No. 1
P014	Repair Press No. 2
P019	Press No. 6 - press used to cure rubber belts
P020	Curing Press No. 7, used to cure rubber belts

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) (PTI P0108395)	Volatile organic compounds (VOC) emissions from these emissions units shall not exceed: P005: 95.96 lb/day, 17.51 ton/yr P006: 193.09 lb/day, 35.24 ton/yr P007: 410.32 lb/day, 74.88 ton/yr P008: 410.32 lb/day, 74.88 ton/yr P009: 48.28 lb/day, 8.81 ton/yr P010: 48.77 lb/day, 8.90 ton/yr P011: 55.50 lb/day, 10.13 ton/yr P012: 92.73 lb/day, 16.30 ton/yr P013: 4.65 lb/day, 0.85 ton/yr P014: 2.31 lb/day, 0.42 ton/yr P019: 75.09 lb/day, 13.21 ton/yr P020: 57.59 lb/day, 10.13 ton/yr

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and 79.15 tons per year from emissions units P005 through P014, P019 and P020 combined. See b)(2)a. and b)(2)b. below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid future PSD considerations)	Volatile organic compound (VOC) emissions shall not exceed 79.15 tons per rolling, 12-month period from emissions units P005 through P014, P019 and P020 combined.

(2) Additional Terms and Conditions

a. The individual daily and annual emissions limitations for these emissions units were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with the individual emissions unit's daily and annual emissions limitations.

b. The monitoring, recordkeeping, reporting and testing requirements for the rolling, 12-month VOC limitation as established in the following terms and conditions are sufficient to demonstrate compliance with the combined annual VOC limitation established under OAC rule 3745-31-05(A)(3) in the original PTI to avoid a BAT study.

c) Operational Restrictions

(1) The permittee shall not exceed 119,712,096 pounds of rubber throughput from emissions units P005 through P014, P019 and P020, per rolling, 12-month period.

[OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record following information on a monthly basis for emissions units P005 through P014, P019 and P020 combined:

a. the number of pounds or tons of rubber processed;

b. the number of gallons of mold release employed;

c. the VOC content of the mold release, in pounds or tons;

d. the total VOC emissions from the rubber processed, rubber processed containing ethanol couplers and mold release employed combined, calculated as follows:

[(the total amount of rubber processed in emissions units P005 through P014, P019 and P020) x (the appropriate Draft AP-42 Rubber Manufacturers Association (RMA) emission factor, Table 4.12-8 for platen press curing, July 1999)] + [(the total amount of mold release employed by emissions units P005 through P014, P019 and P020) x (actual VOC content of the mold release)]

Plus, when applicable:

[(the total amount of rubber processed in emissions units P005 through P014, P019 and P020 containing ethanol couplers processed in each emissions unit) x (% ethanol coupler contained in the rubber) x (% ethanol contained in coupler) x (curing moles) x (mole wt. ethanol/mole wt. coupler)]

e. the rolling, 12-month rubber throughput for these emissions units, as a monthly summation of d)(1)a. above.

f. the rolling, 12-month VOC emissions for these emissions units, as a monthly summation of d)(1)d. above.

[OAC rule 3745-31-05(D) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(A)(3)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. as determined by recordkeeping in d)(1)e. above, an exceedance of the rolling, 12-month rubber throughput; and

b. as determined by recordkeeping in d)(1)f. above, an exceedance of the rolling, 12-month VOC emissions.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Volatile organic compound emissions shall not exceed the following:

P005: 95.96 lb/day, 17.51 ton/yr
P006: 193.09 lb/day, 35.24 ton/yr
P007: 410.32 lb/day, 74.88 ton/yr
P008: 410.32 lb/day, 74.88 ton/yr
P009: 48.28 lb/day, 8.81 ton/yr
P010: 48.77 lb/day, 8.90 ton/yr
P011: 55.50 lb/day, 10.13 ton/yr
P012: 92.73 lb/day, 16.30 ton/yr
P013: 4.65 lb/day, 0.85 ton/yr
P014: 2.31 lb/day, 0.42 ton/yr
P019: 75.09 lb/day, 13.21 ton/yr
P020: 57.59 lb/day, 10.13 ton/yr

Applicable Compliance Method:

The daily VOC emissions limitations were established usingthe following equation.

Maximum VOC emissions, lb/day = (Maximum rubber throughput, lb/hr) x (24 hr/day) x (EF, lb VOC/lb rubber) + (Maximum mold release throughput, lb/hr) x (24 hr/day) x (Maximum Mold Release VOC content, lb VOC/lb mold release), where:

Maximum rubber throughput = varies per emissions unit
EF = 3.28×10^{-3}lb VOC/lb rubber (AP-42 4.12 RMA Table - #22 & Ethanol)
Maximum mold release throughput = varies per emissions unit
Maximum Mold Release VOC content = 0.11 lb VOC/lb mold release

The annual VOC emissions limitations were established by multiplying the hourly limitation by 8,760 hr/yr and then dividing by 2,000 lb/ton.

b. Emissions Limitation:

79.15 tons VOC per rolling, 12-month period from emissions units P005 through P014, P019 and P020 combined.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in d)(1) above.

g) Miscellaneous Requirements

(1) None.