

Synthetic Minor Determination and/or Netting Determination

Permit To Install 08-04619

A. Source Description

Rubber Seal is a manufacturer of coatings. This PTI application is for three additional 600 gallon mixers with 60 horse power dispersers (P010, P011 and P012). Rubber Seal will be accepting limitations which limit the facility wide Hazardous Air Pollutant (HAP) emissions below Title V threshold of 25 tons per year (TPY) total combined HAPs and 10 TPY any individual HAP. The following sources contribute to Rubber Seal's facility wide potential HAP emissions:

Emission Unit	Description	HAP PTE			VOC
		Combined	Toluene	Xylene	PTE / Allowable
P001	400 gal clear coat mixer No. 1 w. filling station	1.372	0.13	1.11	4.38
P002	400 gal clear coat mixer No. 2 w. filling station	1.372	0.13	1.11	4.38
P003	400 gal clear coat mixer No. 3 w. filling station	1.372	0.13	1.11	4.38
P004	400 gal clear coat mixer No. 4 w. filling station	1.372	0.13	1.11	4.38
P005	600 gal primer mixer w/ 60 Hp disperser and filling station	4.45	2.26	2.66	7.3
P006	400 gal primer mixer w/ 60 Hp disperser and filling station	4.45	2.22	2.66	7.3
P007	400 gal undercoat mixer w/ 30 Hp disperser & filling station	7.31	5.72	5.9	7.3
P008	300 gal high speed intermediate mixer and filling station	7.29	7.29	0.02	7.3
P009	Tank cleanup operations	5.3	5.3	0	5.3
P010	600 gal mixer w/ 60 Hp disperser	4.45	2.26	2.66	7.3
P011	600 gal mixer w/ 60 Hp disperser	4.45	2.26	2.66	7.3
P012	600 gal mixer w/ 60 Hp disperser	4.45	2.26	2.66	7.3
de minimis	paint booth (<10lbs/day)	0.55	0.12	0.28	1.2
de minimis	paint booth (<10lbs/day)	0.55	0.12	0.28	1.2
de minimis	Pony Mixers	0	0	0	0.88
de minimis	Sigma Blade Mixer	0.47	0.11	0.36	0.74
de minimis	Planetary mixer	0.34	0.09	0.25	0.53
de minimis	Planetary mixer	0.34	0.09	0.25	0.53
de minimis	high speed disperser	0.36	0.08	0.28	0.57
Potential To Emit:		50.25	30.7	25.36	79.57

B. Facility Emissions and Attainment Status

Rubber Seal is located in Montgomery County, which is currently designated as attainment for all criteria pollutants except ozone. Rubber Seal has 19 emissions units, of which 9 are currently permitted as synthetic minors, 3 will be permitted as synthetic minors and 7 are de minimis sources. Rubber Seal has the potential to emit HAP emissions greater than the major source thresholds for individual and total combined HAPs.

C. Source Emissions

Potential HAP emissions are 30.7 TPY Toluene, 25.36 TPY xylene and 50.25 TPY total combined HAPs. This permit will be issued in draft and will have federally enforceable limitations in order to restrict potential HAP emissions. The permittee has accepted a facility wide limitations of 9.9 tons of any individual HAP, as a rolling, 12-month summation and 24.9 tons of total HAPs, as a rolling 12-month summation, from all emissions units at the facility. In order to demonstrate compliance with

these limitations, the permittee shall maintain monthly records of the individual HAP emission rates for each HAP as well as the total HAP emission rates from all emissions units at the facility. Quarterly deviation reports shall be submitted to identify any exceedances of the HAP emission limitations as well as annual reports of the HAP emissions for the calendar year.

D. Conclusion

A PTI is recommended for these emissions units. Federal enforceability of the synthetic minor emission limitation will be achieved through monthly records of the HAP emissions, for each individual HAP and for the total combined HAPs, to ensure that potential HAP emissions are less than the major source thresholds.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04619

Fac ID: 0857733184

DATE: 9/2/2004

Rubber-Seal Products Co
Angela Patton
5751 N Webster St
Dayton, OH 45414-3520

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

KY

IN

MONTGOMERY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04619 FOR AN AIR CONTAMINANT SOURCE FOR
Rubber-Seal Products Co**

On 9/2/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Rubber-Seal Products Co**, located at **5751 N Webster St, Dayton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04619:

3-600 gallon primer mixers with 60Hp disperser.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04619

Application Number: 08-04619
Facility ID: 0857733184
Permit Fee: **To be entered upon final issuance**
Name of Facility: Rubber-Seal Products Co
Person to Contact: Angela Patton
Address: 5751 N Webster St
Dayton, OH 45414-3520

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5751 N Webster St
Dayton, Ohio**

Description of proposed emissions unit(s):
3-600 gallon primer mixers with 60Hp disperser.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Rubber-Seal Products Co

Facility ID: 0857733184

PTI Application: 08-04619

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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.

4. 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

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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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is

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granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	21.9
Individual HAP	9.9
Combined HAP	24.9

Rubber
PTI A

Emissions Unit ID: P010

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 - 600 gallon mixer with 60 horse power disperser	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.45 pounds per hour (lbs/hr) and 40 pounds per day (lbs/day).
		The OC emissions from this emissions unit shall not exceed 7.3 tons per year (TPY).
	OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V and 40 CFR Part 63, Subpart HHHHH.	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.
		Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.
		The emission limitation specified by

Rubber

PTI A

Issued: To be entered upon final issuance

this rule is less stringent than the
emission limitation established
pursuant to OAC rule
3745-31-05(A)(3).

Emissions Unit ID: **P010**

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The 2.45 lbs OC/hour emission limitation is being developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum daily primer production rate for this emissions unit shall not exceed 816 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this primer mixer:
- The company identification for each primer produced.
 - The number of gallons of each primer produced.
 - The total number of gallons of primer produced.
 - The organic compound content of each primer produced, in pounds per gallon.
 - The total organic compound (OC) emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
 - The sum of the total OC emissions from each primer produced (i.e., the sum of (e) above).
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011 and P012):
- The name and identification number of each coating, primer, undercoat, and intermediate produced.
 - The individual HAP* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
 - The number of gallons of each coating, primer, undercoat, and intermediate produced.

Emissions Unit ID: **P010**

- d. The name and identification of each cleanup material employed.
- e. The individual HAP* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
- f. The number of gallons of each cleanup material employed.
- g. The number of gallons of cleanup material recovered for disposal.
- h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
- i. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P010) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m³): 85

Maximum Hourly Emission Rate (lbs/hr): 20.82

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 846

MAGLC (ug/m3): 2029

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still

satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the organic compound emissions from the primers exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the daily primer production for this emissions unit exceeded 816 gallons per day, and the actual primer production for each such day.
 - c. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation specified in Section A.1 of these terms and conditions.
 - d. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation specified in Section A.1 of these terms and conditions.

These deviation reports shall be submitted in accordance with Part I, General Condition A.2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 2.45 lbs/hr.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all primers mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.

**Rubber
PTI A**

Emissions Unit ID: **P010**

Issued: To be entered upon final issuance

- b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1.

- c. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 7.3 TPY

Rubber-Seal Products Co
PTI Application: 08 04610
Issued

Facility ID: 0857733184

Emissions Unit ID: **P010**

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

The individual HAP emissions from this emissions unit shall not exceed 9.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

The total combined HAP emissions from this emissions unit shall not exceed 24.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

f. Operational Limitation -

The primer production from this emissions unit shall not exceed 816 gallons/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1.

F. Miscellaneous Requirements

None

Rubber
PTI A

Emissions Unit ID: P011

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - 600 gallon mixer with 60 horse power disperser	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.45 pounds per hour (lbs/hr) and 40 pounds per day (lbs/day).
		The OC emissions from this emissions unit shall not exceed 7.3 tons per year (TPY).
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.
	OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V and 40 CFR Part 63, Subpart HHHHH.	Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.
		Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by

Rubber**PTI A**Emissions Unit ID: **P011****Issued: To be entered upon final issuance**

this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The 2.45 lbs OC/hour emission limitation is being developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum daily primer production rate for this emissions unit shall not exceed 816 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this primer mixer:
 - a. The company identification for each primer produced.
 - b. The number of gallons of each primer produced.
 - c. The total number of gallons of primer produced.
 - d. The organic compound content of each primer produced, in pounds per gallon.
 - e. The total organic compound (OC) emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
 - f. The sum of the total OC emissions from each primer produced (i.e., the sum of (e) above).
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011 and P012):
 - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.

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- b. The individual HAP* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
 - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
 - d. The name and identification of each cleanup material employed.
 - e. The individual HAP* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
 - f. The number of gallons of each cleanup material employed.
 - g. The number of gallons of cleanup material recovered for disposal.
 - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
 - i. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
 - j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
 - k. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.
- *A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.
3. The permit to install for this emissions unit (P011) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

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Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m³): 85

Maximum Hourly Emission Rate (lbs/hr): 20.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 846

Issued: To be entered upon final issuance

MAGLC (ug/m3): 2029

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that

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show the results of the application of the "Air Toxic Policy" for the change.

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1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the organic compound emissions from the primers exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the daily primer production for this emissions unit exceeded 816 gallons per day, and the actual primer production for each such day.
 - c. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation specified in Section A.1 of these terms and conditions.
 - d. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation specified in Section A.1 of these terms and conditions.

These deviation reports shall be submitted in accordance with Part I, General Condition A.2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 2.45 lbs/hr.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all primers mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.
 - b. Emission Limitation -

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The OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1.

- c. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 7.3 TPY

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1 and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

- d. Emission Limitation -

The individual HAP emissions from this emissions unit shall not exceed 9.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

- e. Emission Limitation -

The total combined HAP emissions from this emissions unit shall not exceed 24.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

- f. Operational Limitation -

The primer production from this emissions unit shall not exceed 816 gallons/day.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - 600 gallon mixer with 60 horse power disperser	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.45 pounds per hour (lbs/hr) and 40 pounds per day (lbs/day).
		The OC emissions from this emissions unit shall not exceed 7.3 tons per year (TPY).
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.
	OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V and 40 CFR Part 63, Subpart HHHHH.	Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.
		Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by

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this rule is less stringent than the
emission limitation established
pursuant to OAC rule
3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The 2.45 lbs OC/hour emission limitation is being developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum daily primer production rate for this emissions unit shall not exceed 816 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this primer mixer:
 - a. The company identification for each primer produced.
 - b. The number of gallons of each primer produced.
 - c. The total number of gallons of primer produced.
 - d. The organic compound content of each primer produced, in pounds per gallon.
 - e. The total organic compound (OC) emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
 - f. The sum of the total OC emissions from each primer produced (i.e., the sum of (e) above).
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011 and P012):
 - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.

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- b. The individual HAP* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
- c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
- d. The name and identification of each cleanup material employed.
- e. The individual HAP* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
- f. The number of gallons of each cleanup material employed.
- g. The number of gallons of cleanup material recovered for disposal.
- h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
- i. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P012) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

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Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (mg/m³): 85

Maximum Hourly Emission Rate (lbs/hr): 20.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 846

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MAGLC (ug/m3): 2029

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that

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Rubber**PTI A**Emissions Unit ID: **P012****Issued: To be entered upon final issuance****D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the organic compound emissions from the primers exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - b. An identification of each day during which the daily primer production for this emissions unit exceeded 816 gallons per day, and the actual primer production for each such day.
 - c. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation specified in Section A.1 of these terms and conditions.
 - d. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation specified in Section A.1 of these terms and conditions.

These deviation reports shall be submitted in accordance with Part I, General Condition A.2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 2.45 lbs/hr.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all primers mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.
 - b. Emission Limitation -

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The OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1.

- c. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 7.3 TPY

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1 and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

- d. Emission Limitation -
The individual HAP emissions from this emissions unit shall not exceed 9.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2.

- e. Emission Limitation -
The total combined HAP emissions from this emissions unit shall not exceed 24.9 TPY, as a rolling, 12-month summation.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.2.

- f. Operational Limitation -
The primer production from this emissions unit shall not exceed 816 gallons/day.

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1.

F. Miscellaneous Requirements

None