

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

5/8/2014

William Wibbeler
Ashtabula Tire Partners
1035 Pearl St.
Boulder, CO 80302

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0204012013
Permit Number: P0115936
Permit Type: Initial Installation
County: Ashtabula

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. 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 draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,


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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Pennsylvania; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Ashtabula Tire Partners (ATP) in Ashtabula, Ohio, in Ashtabula County is a tire conversion facility. The facility processes waste tires. The facility will process the tires using pyrolysis units. The pyrolysis process thermally decomposes and releases the volatile portions of the organic materials in the tires. In the process, synthetic gases are produced. The synthetic gases will be cleaned and used in the pyrolysis units themselves or in gas turbines to produce heat and generate electricity. Other by-products of the pyrolysis process are oil and char material. The oil will be processed and shipped off-site via tanker trucks. The char material will be used to generate carbon black.

This permit is for the initial installation of the Ashtabula Tire Partners facility. The following emissions units are addressed in this permit:

B001 through B004: Four 4 mmBtu/hr pyrolysis units with low NO_x burners and a flare for syngas diversion, if needed;

F001: Paved roadways and parking areas;

J001: Oil loading with submerged fill for transportation off-site;

P001 and P002: Two tire shredding lines controlled by a baghouse;

P003 and P004: Two 16 mmBtu/hr gas turbines with low NO_x burners;

P005: Jet mill controlled by a baghouse for carbon black processing;

P006: Dryer controlled by a baghouse for carbon black processing;

P007: Pelletizer, pellet packout, magnetic drum separator, oversize screen, fiber removal screen, silo/hopper controlled by a baghouse for carbon black processing;

T001: 210,000 gallon oil storage tank with vertical fixed roof and submerged fill;

T002: 84,000 gallon bulk storage tank for reject oil with vertical fixed roof, vacuum pressure vent, and submerged fill; and

T003 and T004: Two 31,500 gallon bulk storage tanks for product oil with vertical fixed roofs, vacuum pressure vents, and submerged fill.

3. Facility Emissions and Attainment Status:

Ashtabula Tire Partners is a potential major source of PM₁₀ emissions. Emissions units P005, P006, and P007 have potential uncontrolled PM₁₀ emissions of 657 tpy, 920 tpy, and 1314 tpy, respectively. Emissions units P001 and P002 have potential uncontrolled PM₁₀ emissions of 75 tpy each. The pyrolysis units have potential uncontrolled PM₁₀ emissions of 0.09 tpy each. The turbines have potential uncontrolled PM₁₀ emissions of 0.53 tpy each. The roadways and parking areas have potential PM₁₀ of 8.0 tpy. Fugitive emissions are not included in the facility-wide PM₁₀ emissions evaluation since this source is not a stationary source category identified in OAC rule 3745-77-01(W)(2).



4. Source Emissions:

This permit restricts PM10 emissions from emissions units P001, P002, P005, P006, and P007 by requiring the use of baghouses with the following limits, respectively: 0.002 gr/dscf, 0.002 gr/dscf, 0.01 gr/dscf, 0.02 gr/dscf, and 0.01 gr/dscf. Taking into consideration the above limitations, allowable PM10 emissions from each of these emissions units are as follows:

- P001: 1.5 tpy (stack)
- P002: 1.5 tpy (stack)
- P005: 6.6 tpy (stack)
- P006: 6.8 tpy (stack)
- P007: 9.3 tpy (stack)

Therefore, total allowable PM10 emissions from these emissions units are 25.7 tpy. By requiring use of the baghouses, facility-wide PM10 emissions will be well below the 100 tpy threshold for a major source.

5. Conclusion:

This permit requires the use of baghouses to limit PM10 emissions and reduce potential PM10 emissions to levels below the major source threshold. Therefore, the facility is not a major source of PM10.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM10	27.12

PUBLIC NOTICE

5/8/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Ashtabula Tire Partners

Ashtabula City Industrial Park, Brookdale Avenue,

Ashtabula, OH 44004

Ashtabula County

FACILITY DESC.: All Other Basic Inorganic Chemical Manufacturing, General Warehousing and Storage

PERMIT #: P0115936

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for a waste tire conversion facility. Waste tires will be processed in a number of different emissions units to produce synthetic gas, crude oil, and carbon black.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kristen Switzer, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Ashtabula Tire Partners**

Facility ID:	0204012013
Permit Number:	P0115936
Permit Type:	Initial Installation
Issued:	5/8/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Ashtabula Tire Partners

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	5
2. Who is responsible for complying with this permit?	5
3. What records must I keep under this permit?	5
4. What are my permit fees and when do I pay them?.....	5
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	6
7. What reports must I submit under this permit?	6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	7
13. Can I transfer this permit to a new owner or operator?.....	8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	8
15. What happens if a portion of this permit is determined to be invalid?	8
B. Facility-Wide Terms and Conditions.....	9
C. Emissions Unit Terms and Conditions	11
1. F001, F001	12
2. J001, J001	17
3. P005, P005	20
4. P006, P006	27
5. P007, P007	34
6. T001, T001	41
7. T002, T002	44
8. Emissions Unit Group -Bulk storage tanks for product: T003,T004,	48
9. Emissions Unit Group -Gas turbines 1 MW: P003,P004,.....	52



10. Emissions Unit Group -Pyrolysis units 1 - 4: B001,B002,B003,B004,..... 64

11. Emissions Unit Group -Shredder lines 1 - 2: P001,P002, 69



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0204012013
Application Number(s): A0049114
Permit Number: P0115936
Permit Description: Initial installation permit for a waste tire conversion facility. Waste tires will be processed in a number of different emissions units to produce synthetic gas, crude oil, and carbon black.
Permit Type: Initial Installation
Permit Fee: \$5,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/8/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Ashtabula Tire Partners
Ashtabula City Industrial Park, Brookdale Avenue
Ashtabula, OH 44004

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0115936

Permit Description: Initial installation permit for a waste tire conversion facility. Waste tires will be processed in a number of different emissions units to produce synthetic gas, crude oil, and carbon black.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

- Emissions Unit ID: F001**
Company Equipment ID: F001
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: J001**
Company Equipment ID: J001
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P005**
Company Equipment ID: P005
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P006**
Company Equipment ID: P006
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P007**
Company Equipment ID: P007
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T001**
Company Equipment ID: T001
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: T002**
Company Equipment ID: T002
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Bulk storage tanks for product

Emissions Unit ID:	T003
Company Equipment ID:	T003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	T004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Group Name: Gas turbines 1 MW

Emissions Unit ID:	P003
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	P004
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Pyrolysis units 1 - 4

Emissions Unit ID:	B001
Company Equipment ID:	B001
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	B002
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	B003
Company Equipment ID:	B003
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	B004
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Shredder lines 1 - 2

Emissions Unit ID:	P001
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	P002
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Draft Permit-to-Install and Operate
Ashtabula Tire Partners
Permit Number: P0115936
Facility ID: 0204012013
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the “Authorization” page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The permittee has evaluated the applicability of 40 CFR Part 63, Subpart M, Carbon Black Production (area sources), to the pyrolysis process and carbon black process and determined that it does not apply to Ashtabula Tire Partners. The application states that although 40 CFR Part 63, Subpart M, applies to area sources of "carbon black production", the process employed at Ashtabula Tire Partners is different from the process covered by the rule and, therefore, is not subject to the rule. Specifically, "carbon black production" is defined in 40 CFR Part 63, Subpart YY, Generic MACT, Carbon Black Production, as "the production of carbon black by either the furnace, thermal, acetylene decomposition, or lampblack process". A "carbon black production unit" is defined in the rule as "the equipment assembled and connected by hard-piping or duct work to process raw materials to manufacture, store, and transport a carbon black product". 40 CFR Part 63, Subpart M, incorporates these definitions by reference. The preamble for 40 CFR Part 63, Subpart M, describes in further detail the processes covered by the definition of "carbon black production". The permittee has determined that the "tire sublimation" process employed at Ashtabula Tire Partners differs from the processes subject to 40 CFR Part 63, Subpart M, and, therefore, is not subject to the rule.
3. The permittee is exempt from 40 CFR Part 60, Subpart A, Standards of Performance for Small Municipal Waste Combustion Units, in accordance with 40 CFR 60.1020(h), provided that the following requirements are met:
 - a) The pyrolysis/combustion unit is an integrated part of a plastics/rubber recycling unit as defined under "Definitions" in 40 CFR 60.1465.
 - b) The owner or operator of the unit records the weights, each quarter, of plastics, rubber, and rubber tires processed.
 - c) The owner or operator of the unit records the weights, each quarter, of feed stocks produced and marketed from chemical plants and petroleum refineries.
 - d) The owner or operator of the unit keeps the name and address of the purchaser of those feed stocks.



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F001, F001

Operations, Property and/or Equipment Description:

Paved roadways and parking areas

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	Develop and implement a site-specific work practice plan designed as described in section d)(1) below to minimize or eliminate fugitive dust emissions. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(B)(4)	There shall be no visible emissions of fugitive dust from the paved roadways and/or parking areas except for a period of time not to exceed 6 minutes during any 60-minute observation period.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)d through b)(2)g.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Permit-to-Install P0115936 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

Develop and implement site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.

- c. The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust emissions. The work practice plan shall include the following information:
- i. An identification of each segment of paved roadway or parking area for which the plan applies;
 - ii. A determination of the frequency that the roadway or parking area will be inspected to determine if additional control measures are needed;
 - iii. The identification of the record keeping form that will be used to track the inspection and treatment. This form should include, at a minimum, the following elements:
 - (a) Roadway or parking area segment inspected;
 - (b) Date inspected;
 - (c) Name of employee doing the inspection;
 - (d) Result of the inspection (needs treatment or not);
 - (e) A description of why no treatment was needed;
 - (f) Date treated;



- (g) Name of employee treating the segment; and
 - (h) Method used to treat the segment.
 - iv. A description of how and where the records shall be maintained. Records must be kept for at least five years; and
 - v. A description of the records that must be submitted if the plan is not followed.
 - d. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements.
 - e. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
 - f. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
 - g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Work Practice Plan

The permittee shall develop and implement a site-specific Work Practice Plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This Work Practice Plan shall include, at a minimum, the following elements:

 - a. An identification of each segment of unpaved roadway or parking area for which the plan applies.
 - b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.



- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways/parking areas. This form/record should include, at a minimum, the following elements:
 - i. Roadway or parking area segment inspected;
 - ii. Date inspected;
 - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee who either treated the segment or who can verify that the segment was treated; and
 - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA (Northeast District Office) approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Northeast District Office for review and approval. The permittee can begin using the revised Work Practice Plan once Northeast District Office has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. the records required to be collected under the Work Practice Plan; and



- b. the date and reason any element of the Work Practice Plan was not implemented.
- (4) The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.
- e) Reporting Requirements
 - (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Northeast District Office.
 - (2) The permittee shall submit semiannual deviation reports concerning any failure to implement the Work Practice Plan in accordance with the reporting requirements of the Standard Terms and Conditions of Part I of this permit.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- 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:

There shall be no visible emissions of fugitive dust from the paved roadways and/or parking areas except for a period of time not to exceed 6 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for fugitive dust from the paved roadways and/or parking areas shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-07(B)(4).
- g) Miscellaneous Requirements
 - (1) None.



2. J001, J001

Operations, Property and/or Equipment Description:

Oil loading with a fully submerged filling system for transportation off-site

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.57 ton per month over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the



revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOCs is less than 10 tons per year.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the Ohio EPA Northeast District Office upon verbal or written request:

- a. the daily quantity of all material loaded.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.

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:

VOC emissions shall not exceed 0.57 ton per month over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated based on the following calculation from AP-42, Section 5.2 (6/08), Equation 1, for truck loading:

$$L_L = \{12.46 \times [(S \times P \times M)/T]\}/12$$



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

where:

L_L = loading loss, in pounds of VOC per 1,000 gallons (lb/1,000 gal);

S = 0.6 (saturation factor);

P = 1.73 (true vapor pressure of liquid from permittee's application and TANKS);

M = 72.80 [molecular weight of vapors (lb/lb-mole) from permittee's application and TANKS];

T = 510 [temperature of bulk liquids stored, in degrees Rankine (degrees F + 460 degrees)]; and

12 = conversion to tons VOC per month.

$L_L = 12.46 \times [(0.6 \times 1.73 \times 72.80)/510] = 1.85$ pounds of VOC per 1,000 gallons of liquid stored

Therefore:

$\text{VOC (ton/month)} = [(1.85 \text{ lbs VOC}/1,000 \text{ gallons}) \times 7,350,362 \text{ gallons per year} \times (1 \text{ ton}/2,000 \text{ pounds})]/12 = 0.57 \text{ ton VOC/month}$

g) Miscellaneous Requirements

(1) None.



3. P005, P005

Operations, Property and/or Equipment Description:

Jet mill process application equipped with a baghouse for pelletizing carbon black

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, b)(2)b, c)(1), d)(1), e)(2), f)(1)a, f)(1)b and f)(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(D) [synthetic minor to avoid Title V for particulate emissions with a diameter of of 10 microns or less (PM ₁₀)]	PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 6.6 tons per year as a rolling, 12-month average. PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.01 gr/dscf. See b)(2)a, b)(2)b and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install a baghouse that is designed to meet 0.01 gr PM/dscf. See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. The permittee shall control emissions from this emissions unit by venting emissions from this emissions unit to a baghouse whenever the emissions unit is in operation.
- b. The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.01 gr/dscf (provided in permit application), and exhaust flow rate (17,500 dscf/min). Therefore, compliance shall be assumed provided that the outlet concentration restriction and exhaust flow rate are maintained. The controlled potential to emit for PM₁₀ for this emissions unit, provided the parameters listed above are met, is 6.6 tons per year.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM₁₀ emissions from this air contaminant source since the controlled potential to emit for PM₁₀ is less than 10 tons per year.



c) Operational Restrictions

- (1) The emissions unit shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.01 gr PM₁₀/dscf at all times the emissions unit is in operation.
- (2) The air pollution control system shall be operated with sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- (3) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;



- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit is in operation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- (2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in e)(2)a (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(2)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(2)a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible particulate emissions in d)(3) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 6.6 tons per year as a rolling, 12-month average.

Applicable Compliance Method:

The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.01 gr/dscf (provided in permit application), and exhaust flow rate (17,500 dscf/min) and can be calculated as follows:

$$6.6 \text{ tpy} = 0.01 \text{ gr/dscf} \times 17,500 \text{ dscf/min} \times 1 \text{ lb/7000 gr} \times 60 \text{ min/hr} \times 1 \text{ ton/2000 lbs} \times 8760 \text{ hrs/yr}$$

b. Emission Limitation:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.01 gr/dscf.

Applicable Compliance Method:

Compliance with the grain loading limit shall be demonstrated in accordance with the emission testing requirements specified in f)(2).

c. Emission Limitation:

Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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

- a. The emissions testing shall be conducted within 180 days after initial operation of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the grain loading emission limitation for PM₁₀.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4; and

40 CFR Part 51, Appendix M, Method 201 or 201A.



- d. Pressure drop readings for the baghouse associated with this emissions unit shall be recorded during the test(s) to establish an acceptable pressure drop range for the Monitoring and/or Recording Keeping Requirements in section d) of these terms and conditions.
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.



4. P006, P006

Operations, Property and/or Equipment Description:

Dryer process application equipped with a baghouse for pelletizing carbon black

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, b)(2)b, c)(1), d)(1), e)(2), f)(1)a, f)(1)b and f)(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(D) [synthetic minor to avoid Title V for particulate emissions with a diameter of 10 microns or less (PM ₁₀)]	PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 6.8 tons per year as a rolling, 12-month average. PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.02 gr/dscf. See b)(2)a, b)(2)b and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install a baghouse that is designed to meet 0.02 gr/dscf. See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. The permittee shall control emissions from this emissions unit by venting emissions from this emissions unit to a baghouse whenever the emissions unit is in operation.
- b. The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.02 gr/dscf (provided in permit application), and exhaust flow rate (9,000 dscf/min). Therefore, compliance shall be assumed provided that the outlet concentration restriction and exhaust flow rate are maintained. The controlled potential to emit for PM₁₀ for this emissions unit, provided the parameters listed above are met, is 6.8 tons per year.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM₁₀ emissions from this air contaminant source since the controlled potential to emit for PM₁₀ is less than 10 tons per year.



c) Operational Restrictions

- (1) The emissions unit shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.02 gr PM₁₀/dscf at all times the emissions unit is in operation.
- (2) The air pollution control system shall be operated with sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- (3) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;



- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit is in operation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- (2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in e)(2)a (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(2)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(2)a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible particulate emissions in d)(3) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 6.8 tons per year as a rolling, 12-month average.

Applicable Compliance Method:

The annual emissions limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.02 gr/dscf (provided in permit application), and exhaust flow rate (9,000 dscf/min) and can be calculated as follows:

$$6.8 \text{ tpy} = 0.02 \text{ gr/dscf} \times 9,000 \text{ dscf/min} \times 1 \text{ lb/7000 gr} \times 60 \text{ min/hr} \times 1 \text{ ton/2000 lbs} \times 8760 \text{ hrs/yr}$$

b. Emission Limitation:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.02 gr/dscf.

Applicable Compliance Method:

Compliance with the grain loading limit shall be demonstrated in accordance with the emission testing requirements specified in f)(2).

c. Emission Limitation:

Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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

- a. The emissions testing shall be conducted within 180 days after initial operation of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the grain loading emission limitation for PM₁₀.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4; and

40 CFR Part 51, Appendix M, Method 201 or 201A.



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

- d. Pressure drop readings for the baghouse associated with this emissions unit shall be recorded during the test(s) to establish an acceptable pressure drop range for the Monitoring and/or Recording Keeping Requirements in section d) of these terms and conditions.
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.



5. P007, P007

Operations, Property and/or Equipment Description:

Magnetic drum separator, oversize screen, fiber removal screen, silo/hopper, pelletizer, and pellet packout process applications for pelletizing carbon black equipped with a baghouse

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, b)(2)b, c)(1), d)(1), e)(2), f)(1)a, f)(1)b and f)(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(D) [synthetic minor to avoid Title V for particulate emissions with a diameter of 10 microns or less (PM ₁₀)]	PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 9.3 tons per year as a rolling, 12-month average. PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.01 gr/dscf. See b)(2)a, b)(2)b and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install a baghouse that is designed to meet 0.01 gr/dscf. See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. The permittee shall control emissions from this emissions unit by venting emissions from this emissions unit to a baghouse whenever the emissions unit is in operation.
- b. The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.01 gr/dscf (provided in permit application), and exhaust flow rate (25,700 dscf/min). Therefore, compliance shall be assumed provided that the outlet concentration restriction and exhaust flow rate are maintained. The controlled potential to emit for PM₁₀ for this emissions unit, provided the parameters listed above are met, is 9.3 tons per year.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM₁₀ emissions from this air contaminant source since the controlled potential to emit for PM₁₀ is less than 10 tons per year.



c) Operational Restrictions

- (1) The emissions unit shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.01 gr PM₁₀/dscf at all times the emissions unit is in operation.
- (2) The air pollution control system shall be operated with sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- (3) The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;



- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit is in operation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- (2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in e)(2)a (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(2)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(2)a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible particulate emissions in d)(3) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 9.3 tons per year as a rolling, 12-month average.

Applicable Compliance Method:

The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.01 gr/dscf (provided in permit application), and exhaust flow rate (25,700 dscf/min) and can be calculated as follows:

$$9.3 \text{ tpy} = 0.01 \text{ gr/dscf} \times 25,700 \text{ dscf/min} \times 1 \text{ lb/7000 gr} \times 60 \text{ min/hr} \times 1 \text{ ton/2000 lbs} \times 8760 \text{ hrs/yr}$$

b. Emission Limitation:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.01 gr/dscf.

Applicable Compliance Method:

Compliance with the grain loading limit shall be demonstrated in accordance with the emission testing requirements specified in f)(2).

c. Emission Limitation:

Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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

- a. The emissions testing shall be conducted within 180 days after initial operation of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the grain loading emission limitation for PM₁₀.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4; and

40 CFR Part 51, Appendix M, Method 201 or 201A.



- d. Pressure drop readings for the baghouse associated with this emissions unit shall be recorded during the test(s) to establish an acceptable pressure drop range for the Monitoring and/or Recording Keeping Requirements in section d) of these terms and conditions.
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.



6. T001, T001

Operations, Property and/or Equipment Description:

210,000 gallon bulk storage tank 1 with vertical fixed roof and submerged fill for storage of product oil

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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.	ORC rule 3704.03(T)	<p>Volatile organic compound (VOC) emissions shall not exceed 1.03 tons per month over a rolling, 12-month period.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(L)	<p>Exempt.</p> <p>See b)(2)b and b)(2)c.</p>
c.	40 CFR Part 60, Subpart Kb	<p>Exempt.</p> <p>See b)(2)d.</p>

(2) Additional Terms and Conditions

a. This air contaminant source has the potential to emit, taking into account air pollution controls installed on the source, of ten or more tons per year of VOC, and as such, shall meet the requirements of ORC 3704.03(T). The Best



Available Technology (BAT) requirement established under ORC 3704.03(T) has been determined to be compliance with the tons per month emission limitation over a rolling, 12-month period.

- b. In accordance with OAC rule 3745-21-09(L)(2), this emissions unit is exempt from the requirements in OAC rule 3745-21-09(L)(1) because it is a fixed roof tank with a capacity less than 422,000 gallons and used to store produced crude oil and condensate prior to lease custody transfer.
 - c. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid other than crude oil and condensate where there is no custody transfer, unless such tank is designed or equipped in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 with an internal floating roof or alternative equivalent control for VOC emissions as may be approved by the Director, prior to storing such petroleum liquids.
 - d. In accordance with 40 CFR 60.110b(d)(4), this emissions unit is exempt from the requirements of 40 CFR Part 60, Subpart Kb, because it is a storage vessel with a design capacity less than or equal to 1,589.874 m³ (422,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer.
- c) Operational Restrictions
- a. None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall record the throughput of the storage tank in gallons per month.
 - (2) The permittee shall maintain records of the U.S. EPA TANKS software program and/or other process simulation program(s) used to determine compliance with the VOC emission limitation pursuant to f)(1)a.
 - (3) The permittee shall maintain records of any petroleum liquid other than crude oil and/or condensate where there has been no custody transfer, that is placed or stored in the fixed roof tank, having a capacity of less than 422,000 gallons. The records shall include:
 - a. the type of petroleum liquid stored;
 - b. the date that such petroleum liquid was first stored in the tank;
 - c. the date removed (if removed);
 - d. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each non-compliant petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; and
 - e. the total gallons of throughput of each non-crude petroleum liquid/non-condensate and/or crude oil that has been through a custody transfer.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- (2) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid other than crude oil and/or condensate where there is no custody transfer, and the tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Ohio EPA Northeast District Office within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons of throughput of each non-crude petroleum liquid/non-condensate, and the proposed method of compliance shall be included in the report.

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:

VOC emissions shall not exceed 1.03 tons per month over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation over a rolling, 12-month period shall be demonstrated based upon the record keeping requirement specified in d)(1) and the U.S. EPA TANKS software program and/or other process simulation program(s).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. In addition, this emissions unit is classified as a "material transfer operation" per Ohio EPA's Engineering Guide "69 and, therefore, modeling is not required. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



7. T002, T002

Operations, Property and/or Equipment Description:

84,000 gallon bulk storage tank 2 with vertical fixed roof, vacuum pressure vent, and submerged fill for storage of reject oil

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions shall not exceed 0.14 ton per month over a rolling, 12-month period.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(L)	<p>Exempt.</p> <p>See b)(2)c and b)(2)d.</p>
d.	40 CFR Part 60, Subpart Kb	<p>Exempt.</p> <p>See b)(2)e.</p>



(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. In accordance with OAC rule 3745-21-09(L)(2), this emissions unit is exempt from the requirements in OAC rule 3745-21-09(L)(1) because it is a fixed roof tank with a capacity less than 422,000 gallons and used to store produced crude oil and condensate prior to lease custody transfer.

d. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid other than crude oil and condensate where there is no custody transfer, unless such tank is designed or equipped in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 with an internal floating roof or alternative equivalent control for VOC emissions as may be approved by the Director, prior to storing such petroleum liquids.

e. In accordance with 40 CFR 60.110b(d)(4), this emissions unit is exempt from the requirements of 40 CFR Part 60, Subpart Kb, because it is a storage vessel with a design capacity less than or equal to 1,589.874 m³ (422,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer.

c) Operational Restrictions

(1) In accordance with the permittee's application, all materials stored in this emissions unit shall have a maximum vapor pressure of 1.93 psia or less at the maximum storage temperature.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the throughput of the storage tank in gallons per month.



- (2) The permittee shall maintain records of any petroleum liquid other than crude oil and/or condensate where there has been no custody transfer, that is placed or stored in the fixed roof tank, having a capacity of less than 422,000 gallons. The records shall include:
 - a. the type of petroleum liquid stored;
 - b. the date that such petroleum liquid was first stored in the tank;
 - c. the date removed (if removed);
 - d. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each non-compliant petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; and
 - e. the total gallons of throughput of each non-crude petroleum liquid/non-condensate and/or crude oil that has been through a custody transfer.

- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
 - (2) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid other than crude oil and/or condensate where there is no custody transfer, and the tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Ohio EPA Northeast District Office within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons of throughput of each non-crude petroleum liquid/non-condensate, and the proposed method of compliance shall be included in the report.

- 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:

VOC emissions shall not exceed 0.14 ton per month over a rolling, 12-month period.



Applicable Compliance Method:

Compliance with the monthly VOC emission limitation over a rolling, 12-month period shall be demonstrated based upon the record keeping requirement specified in d)(1) and the U.S. EPA TANKS software program and/or other process simulation program(s).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. In addition, this emissions unit is classified as a "material transfer operation" per Ohio EPA's Engineering Guide "69 and, therefore, modeling is not required. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



8. Emissions Unit Group -Bulk storage tanks for product: T003,T004,

EU ID	Operations, Property and/or Equipment Description
T003	31,500 gallon bulk storage tank 3 with vertical fixed roof, vacuum pressure vent, and submerged fill for product, day tank
T004	31,500 gallon bulk storage tank 4 with vertical fixed roof, vacuum pressure vent, and submerged fill for product, day tank

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.24 ton per month over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(L)	Exempt. See b)(2)c and b)(2)d.
d.	40 CFR Part 60, Subpart Kb	Exempt. See b)(2)e.



(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. In accordance with OAC rule 3745-21-09(L)(2), this emissions unit is exempt from the requirements in OAC rule 3745-21-09(L)(1) because it is a fixed roof tank with a capacity less than 40,000 gallons.

d. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid other than crude oil and condensate where there is no custody transfer, unless such tank is designed or equipped in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 with an internal floating roof or alternative equivalent control for VOC emissions as may be approved by the Director, prior to storing such petroleum liquids.

e. In accordance with 40 CFR 60.110b(b), this emissions unit is exempt from the requirements of 40 CFR Part 60, Subpart Kb, because it is a storage vessel with a design capacity greater than or equal to 75 m³ (19,812.75 gallons) but less than 151 m³ (39,889.98 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kiloPascals (2.18 psi).

c) Operational Restrictions

(1) In accordance with the permittee's application, all materials stored in this emissions unit shall have a maximum vapor pressure of 1.93 psia or less at the maximum storage temperature.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the throughput of the storage tank in gallons per month.



- (2) The permittee shall maintain records of any petroleum liquid other than crude oil and/or condensate where there has been no custody transfer, that is placed or stored in the fixed roof tank, having a capacity of less than 422,000 gallons. The records shall include:
 - a. the type of petroleum liquid stored;
 - b. the date that such petroleum liquid was first stored in the tank;
 - c. the date removed (if removed);
 - d. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each non-compliant petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute; and
 - e. the total gallons of throughput of each non-crude petroleum liquid/non-condensate and/or crude oil that has been through a custody transfer.

- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
 - (2) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid other than crude oil and/or condensate where there is no custody transfer, and the tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Ohio EPA Northeast District Office within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons of throughput of each non-crude petroleum liquid/non-condensate, and the proposed method of compliance shall be included in the report.

- 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:

VOC emissions shall not exceed 0.24 ton per month over a rolling, 12-month period.



Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation over a rolling, 12-month period shall be demonstrated based upon the record keeping requirement specified in d)(1) and the U.S. EPA TANKS software program and/or other process simulation program(s).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. In addition, this emissions unit is classified as a "material transfer operation" per Ohio EPA's Engineering Guide "69 and, therefore, modeling is not required. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



9. Emissions Unit Group -Gas turbines 1 MW: P003,P004,

EU ID	Operations, Property and/or Equipment Description
P003	Gas turbine equipped with low NO _x burners with rated input capacity of 16 mmBtu/hr
P004	Gas turbine equipped with low NO _x burners, peaking, with rated input capacity of 16 mmBtu/hr

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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.	ORC 3704.03(T)	Nitrogen oxides (NO _x) emissions from emissions unit P003 shall not exceed 1.93 tons per month over a rolling, 12-month period. Carbon monoxide (CO) emissions from emissions unit P003 shall not exceed 1.3 tons per month over a rolling, 12-month period. See b)(2)a and b)(2)f.
b.	OAC rule 3745-31-05(F)	NO _x emissions from emissions unit P004 shall not exceed 0.65 ton per month over a rolling, 12-month period. CO emissions from emissions unit P004 shall not exceed 0.44 ton per month over



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		a rolling, 12-month period. See b)(2)b, b)(2)g, c)(3), d)(3) and e)(3).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)d.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-11(B)(4)	Particulate emissions with a diameter of 10 microns or less (PM ₁₀) shall not exceed 0.040 lb/mmBtu actual heat input.
g.	OAC rule 3745-18-06(F)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.5 lb/mmBtu actual heat input.
h.	OAC rule 3745-110-02(A)(2)(b)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR Part 60, Subpart KKKK.
i.	40 CFR Part 60, Subpart KKKK (40 CFR Part 60.4300 – 60.4420) [In accordance with 40 CFR 60.4305(a), this emissions unit has a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 mmBtu) per hour, based on the higher heating value of the fuel.]	SO ₂ emissions shall not exceed 110 nanograms per Joule (0.90 pound per mega-Watt hour) or 26 ng SO ₂ /J (0.060 lb SO ₂ /mmBtu). NO _x emissions shall not exceed 96 ppm at 15 percent oxygen or 700 ng/J of useful output (5.5 lb/MWh) while firing fuels other than natural gas.

(2) Additional Terms and Conditions

- a. This air contaminant source has the potential to emit, taking into account air pollution controls installed on the source, of ten or more tons per year of NO_x and CO, and as such, shall meet the requirements of ORC 3704.03(T). The best available technology (BAT) requirement established under ORC 3704.03(T) has been determined to be compliance with the tons per month emission limitation over a rolling, 12-month period.
- b. This permit establishes the following voluntary restrictions that are legally and practically enforceable emission limitations. These legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restriction contained in c)(3) which limits annual operating hours to 2920 hours:



- i. NO_x emissions from emissions unit P004 shall not exceed 7.7 tons per year.
 - ii. CO emissions from emissions unit P004 shall not exceed 5.2 tons per year.
- c. The best available technology (BAT) requirement under this rule for emissions unit P004 has been determined to be compliance with the ton per month emission limitations over a rolling, 12-month period.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the emissions limitations established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(b), as effective December 1, 2006, do not apply to the NO_x and CO emissions from emissions unit P004 since the potential to emit (PTE) is less than 10 tons per year taking into consideration legally and practically enforceable requirements established under OAC rule 3745-31-05(F).

- e. Emissions of PM₁₀, VOC and SO₂ from this emissions unit are less than 1 ton per year.
- f. The monthly allowable NO_x and CO emissions averaged over a rolling, 12-month period for emissions unit P003 are based on the unrestricted potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.
- g. The monthly allowable NO_x and CO emissions averaged over a rolling, 12-month period for emissions unit P004 are based on the restricted potential to emit for this emissions unit and 2920 maximum allowable cumulative operating hours. Therefore, compliance with the maximum allowable monthly cumulative operating hours demonstrates compliance with the monthly emission limitations and it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.



c) Operational Restrictions

- (1) The permittee shall only burn biogas fuel generated from the pyrolysis process in this emissions unit.
- (2) The emissions unit shall be equipped with low NO_x burners.
- (3) The maximum annual operating hours for emissions unit P004 shall not exceed 2920 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	243
1-2	487
1-3	730
1-4	973
1-5	1217
1-6	1460
1-7	1703
1-8	1946
1-9	2190
1-10	2433
1-11	2676
1-12	2920

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

- (4) The permittee shall comply with the applicable operational requirements required under 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4333(a)	Operation and maintenance
60.4333(b)	When an affected unit with heat recovery utilizes a common steam header with one or more combustion turbines, the owner or operator shall either comply with 60.4333(b)(1) or 60.4333(b)(2).



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than biogas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for emissions unit P004:
 - a. the operating hours for each month; and
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart KKKK, including the following sections:



60.4335(a) and (b)	Demonstrate compliance for NO _x using water or steam injection
60.4340(a) and (b)	Demonstrate continuous compliance for NO _x not using water or steam injection
60.4345(a) through (e)	Requirements for continuous emission monitoring system equipment
60.4350(a) through (h)	Identifying excess emissions from the continuous emission monitoring system data
60.4355(a) and (b)	Establish and document a proper parameter monitoring plan
60.4360	Determine the total sulfur content of the turbines combustion fuel
60.4365(a) and (b)	Exemption for monitoring the total sulfur content of the fuel
60.4370(a) through (c)	Frequency for determining the sulfur content of the fuel

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in d)(3) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The permittee shall submit quarterly deviation reports for emissions unit P004 which identify all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.



- (4) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA Northeast District Office as are pursuant to 40 CFR Part 60, Subpart KKKK, per the following sections:

60.4375(a) and (b)	Excess emissions and monitor downtime reports
60.4380(a) through (c)	Define excess emissions and monitor downtime for NO _x that must be reported
60.4385(a) through (c)	Define excess emissions and monitor downtime for SO ₂ that must be reported
60.4395	Submission of reports

- (5) Pursuant to 40 CFR Part 60.7, the source owner/operator is hereby advised of the requirement to report the following at appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Actual start-up date (within 15 days after such date); and
- c. Date of performance testing (if required, at least 30 days prior to testing).

Reports shall be sent to:

Ohio Environmental Protection Agency
 DAPC-Permit Management Unit
 50 West Town Street, Suite 700
 P.O. Box 1049
 Columbus, Ohio 43216-1049

And

Ohio EPA Northeast District Office
 Division of Air Pollution Control
 2110 East Aurora Road
 Twinsburg, Ohio 44087

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:

NO_x emissions from emissions unit P003 shall not exceed 1.93 tons per month over a rolling, 12-month period.



Applicable Compliance Method:

- i. The emission limitation for NO_x was established in accordance with the following equation:

$$\text{NO}_x \text{ (tons/month)} = (5.27 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs})/12$$

where:

5.27 lbs/hr = emission factor for NO_x provided by the manufacturer of the turbine;

8760 hrs/yr = the maximum annual number of operating hours;

1 ton/2000 lbs = conversion of lbs to tons; and

12 months = the number of months in a year.

- ii. If required, compliance with the emissions limitation, which is based on an emission factor provided by the manufacturer, shall be demonstrated by testing for hourly emissions in accordance with the following methods:

NO_x: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

b. Emission Limitation:

CO emissions from emissions unit P003 shall not exceed 1.3 tons per month over a rolling, 12-month period.

Applicable Compliance Method:

- i. The emission limitation for CO was established in accordance with the following equation:

$$\text{CO (tons/month)} = (3.56 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs})/12$$

where:

3.56 lbs/hr = emission factor for CO provided by the manufacturer of the turbine;

8760 hrs/yr = the maximum annual number of operating hours;

1 ton/2000 lbs = conversion of lbs to tons; and

12 months = the number of months in a year.

- ii. If required, compliance with the emission limitation, which is based on an emission factor provided by the manufacturer, shall be demonstrated by testing for hourly emissions in accordance with the following methods:

CO: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.



c. Emission Limitation:

NO_x emissions from emissions unit P004 shall not exceed 0.65 ton per month over a rolling, 12-month period.

Applicable Compliance Method:

- i. The emission limitation for NO_x was established in accordance with the following equation:

$$\text{NO}_x \text{ (tons/month)} = (5.27 \text{ lbs/hr} \times 2920 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs})/12$$

where:

5.27 lbs/hr = emission factor for NO_x provided by the manufacturer of the turbine;

2920 hrs/yr = the maximum allowable annual number of operating hours;

1 ton/2000 lbs = conversion of lbs to tons; and

12 months = the number of months in a year.

- ii. If required, compliance with the emission limitation, which is based on an emission factor provided by the manufacturer, shall be demonstrated by testing for hourly emissions in accordance with the following methods:

NO_x: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

d. Emission Limitation:

CO emissions from emissions unit P004 shall not exceed 0.44 ton per month over a rolling, 12-month period.

Applicable Compliance Method:

- i. The emission limitation for CO was established in accordance with the following equation:

$$\text{CO (tons/month)} = (3.56 \text{ lbs/hr} \times 2920 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs})/12$$

where:

3.56 lbs/hr = emission factor for CO provided by the manufacturer of the turbine;

2920 hrs/yr = the maximum allowable number of operating hours;

1 ton/2000 lbs = conversion of lbs to tons; and

12 months = the number of months in a year.



- ii. If required, compliance with the emission limitation, which is based on an emission factor provided by the manufacturer, shall be demonstrated by testing for hourly emissions in accordance with the following methods:

CO: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

- e. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- f. Emission Limitation:

PM₁₀ emissions shall not exceed 0.040 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Method 201.

- g. Emission Limitation:

SO₂ emissions shall not exceed 0.5 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

- h. Emission Limitation:

SO₂ emissions shall not exceed 110 nanograms per Joule (0.90 pound per mega-Watt hour) or 26 ng SO₂/J (0.060 lb SO₂/mmBtu).

Applicable Compliance Method:

Compliance with the SO₂ emission limitations shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6, 6C, 8, or 20 as required in f)(2).

- i. Emission Limitation:

NO_x emissions shall not exceed 96 ppm at 15 percent oxygen or 700 ng/J of useful output (5.5 lb/MWh) while firing fuels other than natural gas.



Applicable Compliance Method:

Compliance with the NO_x emission limitations shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E and Method 3A or 20 as required in f)(2).

j. Emission Limitation:

NO_x emissions from emissions unit P004 shall not exceed 7.7 tons per year.

Applicable Compliance Method:

Compliance with the annual NO_x emission limitation shall be assumed provided that compliance with the monthly NO_x emission limitation over a rolling, 12-month period is maintained.

k. Emission Limitation:

CO emissions from emissions unit P004 shall not exceed 5.2 tons per year.

Applicable Compliance Method:

Compliance with the annual CO emission limitation shall be assumed provided that compliance with the monthly CO emission limitation over a rolling, 12-month period is maintained.

- (2) The permittee shall comply with the applicable testing requirements under 40 CFR Part 60, Subpart KKKK, including the following sections:

60.8	40 CFR Part 60 (NSPS) General testing protocols
60.4400(a) and (b)	Initial and subsequent testing for NO _x
60.4405(a) through (d)	Initial performance test with NO _x -diluent CEMS
60.4410	Establish a valid parameter range for continuous NO _x monitoring
60.4415(a)	Initial and subsequent testing for SO ₂

- (3) Performance testing shall be conducted as required in 40 CFR Part 60, Subpart KKKK. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

later than 180 days after initial startup of such facility. For SO₂, subsequent performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous test).

b. The emission testing shall be conducted to demonstrate compliance with the NO_x and SO₂ emission limitations.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for NO_x: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E and Method 3A or 20; and

for SO₂: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6, 6C, 8 or 20.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

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

g) Miscellaneous Requirements

(1) None.



10. Emissions Unit Group -Pyrolysis units 1 - 4: B001,B002,B003,B004,

EU ID	Operations, Property and/or Equipment Description
B001	Pyrolysis line 1 rated at 4 mmBtu/hr, 50 ton per day capacity
B002	Pyrolysis line 2 rated at 4 mmBtu/hr, 50 ton per day capacity
B003	Pyrolysis line 3 rated at 4 mmBtu/hr , 50 ton per day capacity
B004	Pyrolysis line 4 rated at 4 mmBtu/hr , 50 ton per day capacity

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	NO _x emissions shall not exceed 205 pounds per month averaged over a rolling, 12-month period. CO emissions shall not exceed 322 pounds per month averaged over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-10(B)(1)	Particulate emissions with a diameter of 10 microns or less (PM ₁₀) shall not exceed 0.020 lb/mmBtu actual heat input.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO_x and CO emissions from this air contaminant source since the uncontrolled potentials to emit for NO_x and CO are less than 10 tons per year.

c. Emissions of PM₁₀, VOC and SO₂ from this emissions unit are less than 1 ton per year.

d. The monthly allowable NO_x and CO emissions averaged over a rolling, 12-month period are based on the unrestricted potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The permittee shall only burn natural gas and biogas fuel generated from the pyrolysis process in this emissions unit.

(2) The emissions unit shall be equipped with low NO_x burners.

(3) Biogas fuel from this emissions unit shall be vented to a flare during start-up and shutdown.

(4) Excess biogas fuel shall be vented to a flare in the event the turbines are not operational and during emergencies (i.e., total power failure).



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas and/or biogas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records of all incidences when biogas fuel is exhausted to the flare. The records shall include the duration of time and approximate volume of biogas fuel flared.
- (3) The permittee shall maintain records of all periods of time when biogas fuel is exhausted to the atmosphere and the flare is bypassed.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.



- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible particulate emissions in d)(4) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring and record keeping requirements for the flare in d)(2) and d)(3) above:
 - a. all incidences when biogas fuel is exhausted to the flare, including the duration of time and approximate volume of biogas fuel flared; and
 - b. all periods of time when biogas fuel is exhausted to the atmosphere and the flare is bypassed.

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:

NO_x emissions shall not exceed 205 pounds per month averaged over a rolling, 12-month period.

- Applicable Compliance Method:

The emission limitation for NO_x was established in accordance with the following equation:

$$\text{NO}_x \text{ (lbs/month)} = (0.28 \text{ lb/hr} \times 8760 \text{ hrs/yr}) / 12 \text{ months}$$

where:

0.28 lb/hr = emission factors for NO_x provided for natural gas from AP-42, Section 1.4, and for natural gas from pilot stack test with syngas provided by the permittee in the application (0.196 lb/hr + 0.080 lb/hr);

8760 hrs/yr = the maximum annual number of operating hours; and

12 months = the number of months in a year.

Since the emission limitation is based on the unrestricted potential to emit for this emissions unit, there are no testing requirements.



b. Emission Limitation:

CO emissions shall not exceed 322 pounds per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

The emission limitation for CO was established in accordance with the following equation:

$$\text{CO (lbs/month)} = (0.44 \text{ lb/hr} \times 8760 \text{ hrs/yr}) / 12 \text{ months}$$

where:

0.44 lb/hr = emission factor for CO provided for natural gas from AP-42, Section 1.4, and for natural gas from pilot stack test with syngas provided by the permittee in the application (0.328 lb/hr + 0.103 lb/hr);

8760 hrs/yr = the maximum annual number of operating hours; and

12 months = the number of months in a year.

Since the emission limitation is based on the unrestricted potential to emit for this emissions unit, there are no testing requirements.

c. Emission Limitation:

PM₁₀ emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Method 201.

d. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) None.



11. Emissions Unit Group -Shredder lines 1 - 2: P001,P002,

EU ID	Operations, Property and/or Equipment Description
P001	Shredder line 1, 100 ton per day capacity, equipped with a baghouse
P002	Shredder line 2, 100 ton per day capacity, equipped with a baghouse

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, b)(2)a, b)(2)b, c)(1), d)(1), e)(2), f)(1)a, f)(1)b and f)(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(D) [synthetic minor to avoid Title V for particulate emissions with a diameter of 10 microns or less (PM ₁₀)]	Particulate emissions with a diameter of 10 microns or less (PM ₁₀) from the baghouse stack associated with this emissions unit shall not exceed 1.5 tons per year as a rolling, 12-month average. PM ₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.002 gr/dscf. See b)(2)a, b)(2)b and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Install a baghouse that is designed to meet 0.002 gr/dscf of exhaust gases. See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

- a. This permittee shall control emissions from this emissions unit by venting emissions from this emissions unit to a baghouse.
- b. The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction of 0.002 gr/dscf (provided in permit application), and exhaust flow rate (20,000 dscf/min). Therefore, compliance shall be assumed provided that the outlet concentration restriction and exhaust flow rate are maintained. The controlled potential to emit for PM₁₀ for this emissions unit, provided the parameters listed above are met, is 1.5 tons per year.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM₁₀ emissions from this air contaminant source since the controlled potential to emit for PM₁₀ is less than 10 tons per year.

c) Operational Restrictions

- (1) The emissions unit shall be vented to a dust collection system capable of achieving maximum outlet concentration of 0.002 gr PM₁₀/dscf.



- (2) The air pollution control system shall be operated with sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- (3) The pressure drop across the baghouse shall be maintained within the range of 2.0 to 10.0 inches of water while the emissions unit is in operation.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis when furnace repair and/or cleaning is occurring. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;



- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit is in operation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. The PER must be completed and submitted electronically through the Ohio EPA's "e-Business Center: Air Services.
- (2) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in e)(2)a (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(2)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in e)(2)a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible particulate emissions in d)(3) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 1.5 tons per year as a rolling, 12-month average.



Applicable Compliance Method:

The annual emission limitation was established based on the maximum annual hours of operation (8760 hrs/yr), outlet concentration restriction (provided in permit application), and exhaust flow rate (20,000 dscf/min) and can be calculated as follows:

$$1.5 \text{ tpy} = 0.002 \text{ gr/dscf} \times 20,000 \text{ dscf/min} \times 1 \text{ lb/7000 gr} \times 60 \text{ min/hr} \times 1 \text{ ton/2000 lbs} \times 8760 \text{ hrs/yr}$$

b. Emission Limitation:

PM₁₀ emissions from the baghouse stack associated with this emissions unit shall not exceed 0.002 gr/dscf.

Applicable Compliance Method:

Compliance with the grain loading limit shall be demonstrated in accordance with the emission testing requirements specified in f)(2).

c. Emission Limitation:

Visible particulate emissions from the baghouse vent/stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(2) The permittee shall conduct, or have conducted, emission testing for one of these emissions units in accordance with the following requirements:

- a. The emissions testing shall be conducted within 180 days after initial operation of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the grain loading emission limitation for PM₁₀.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Method 201 or 201A.
- d. Pressure drop readings for the baghouse associated with this emissions unit shall be recorded during the test(s) to establish an acceptable pressure drop range for the Monitoring and/or Recording Keeping Requirements in Section d) of these terms and conditions.



Draft Permit-to-Install and Operate

Ashtabula Tire Partners

Permit Number: P0115936

Facility ID: 0204012013

Effective Date: To be entered upon final issuance

- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.