



9/3/2014

Certified Mail

RICHARD WARD
Roppe Corporation
1602 N UNION ST
FOSTORIA, OH 44830-1158

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
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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

Facility ID: 0374010077
Permit Number: P0117388
Permit Type: Renewal
County: Seneca

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Roppe Corporation**

Facility ID:	0374010077
Permit Number:	P0117388
Permit Type:	Renewal
Issued:	9/3/2014
Effective:	9/3/2014
Expiration:	7/1/2015



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Roppe Corporation

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?.....	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?.....	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. P016, Mixer #3.....	11
2. P019, Accessory Line #1	16
3. Emissions Unit Group -Calendar Lines: P017,P018,	19



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0117388
Facility ID: 0374010077
Effective Date: 9/3/2014

Authorization

Facility ID: 0374010077
Application Number(s): A0051398
Permit Number: P0117388
Permit Description: Renewal PTIO for a Banbury mixer, two calendar lines and an accessory line.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/3/2014
Effective Date: 9/3/2014
Expiration Date: 7/1/2015
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Roppe Corporation
1602 N UNION ST
Fostoria, OH 44830-1158

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

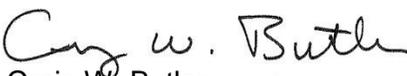
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0117388
 Permit Description: Renewal PTIO for a Banbury mixer, two calendar lines and an accessory line.

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

Emissions Unit ID:	P016
Company Equipment ID:	Mixer #3
Superseded Permit Number:	03-17279
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P019
Company Equipment ID:	Accessory Line #1
Superseded Permit Number:	03-17279
General Permit Category and Type:	Not Applicable

Group Name: Calender Lines

Emissions Unit ID:	P017
Company Equipment ID:	Calender line #1
Superseded Permit Number:	03-17279
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Calender Line #2
Superseded Permit Number:	03-17279
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0117388
Facility ID: 0374010077
Effective Date: 9/3/2014

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 [DO/LAA] 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.



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0117388
Facility ID: 0374010077
Effective Date: 9/3/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Roppe Corporation

Permit Number: P0117388

Facility ID: 0374010077

Effective Date: 9/3/2014

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.



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0117388
Facility ID: 0374010077
Effective Date: 9/3/2014

C. Emissions Unit Terms and Conditions



1. P016, Mixer #3

Operations, Property and/or Equipment Description:

Banbury Mixing Operation (banbury mixer 3, warm-up mill, conveyors, and cooling racks) with 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. 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(F)	Particulate matter equal to or less than 10 microns in diameter (PM10) shall not exceed 1.82 lbs/hr and 7.97 tons/yr Visible particulate emissions from the stack serving this emissions unit shall not exceed 0% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Organic compound (OC) emissions shall not exceed 47.83 lbs/day and 8.73 tons/year See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	OAC rule 3745-21-07(M)	See b)(2)e.

(2) Additional Terms and Conditions

a. This permit establishes the following voluntary restrictions that are legally and practically enforceable limitations. These emission limitations are based on the operational restriction contained in c)(1) which requires a dust collector to control particulate matter:

- i. 1.82 lbs PM10/hr and 7.97 tons PM10/yr from the baghouse stack;
- ii. Visible particulate emissions from the stack serving these emissions units shall not exceed 0% opacity, as a 6-minute average.

All emissions are considered to be PM10.

b. The Best Available Technology (BAT) requirements for this emissions unit have been determined to be the following:

- i. compliance with the operational restriction contained in c)(1) which requires a dust collector to control particulate matter [see c)(1)]; and
- ii. compliance with the lbs/day and tons/year limitations for OC established in b)(1)b.

Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 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 voluntary restrictions established pursuant to OAC rule 3745-31-05(F) were established in part for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A), as effective 12/01/06 [see b)(2)c.], and will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a), as effective 12/01/06, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

BAT requirements also do not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit (PTE) is less than 10 tons per year. The PTE for OC* is 8.73 tons/year and was calculated by summing the potential OC emissions from the banbury mixer and warm-up mill, as follows:

- i. Potential OC emissions from the mixer were determined by multiplying an emission factor of 1.23 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum number of batches per 24-hour period (288), the maximum weight of a batch (550 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs; and
- ii. Potential OC emissions from the warm-up mill were determined by multiplying an emission factor of 1.79 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum number of batches per 24-hour period (288), the maximum weight of a batch (550 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs.

*All OC is considered to be VOC.

- d. The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
 - e. This emissions unit is not subject to the requirements of the rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).
- c) Operational Restrictions
- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements [see b)(2)a.):
 - a. Emissions units P016 shall be vented to a dust collector, capable of achieving a control efficiency of 95.0% for captured particulate matter.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly 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. the total duration of any visible emissions incident; and



c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) 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 eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective actions to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

1.82 lbs PM10/hr and 7.97 tons PM10/yr from the baghouse stack

Applicable Compliance Method:

The lb/hr emission limitation was established by multiplying the uncontrolled mass rate of emissions of 36.30 lbs PM10/hr [based on a maximum process weight rate of 6,600 lbs rubber processed/hr, an uncontrolled release rate of 0.5% from clay, rubber, and rubber chemicals (engineering judgment), and an uncontrolled release rate of 0.05% from process oil (engineering judgment)], by a minimum control efficiency of 95%.

If required, the control efficiency and lb/hr limitation shall be determined in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and the following methods as applicable: Method 5 of 40 CFR Part 60, Appendix A, Methods 201/201A and 202, of 40 CFR Part 51, Appendix M. Alternative U.S. EPA



approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for this emissions unit, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitation:

Visible particulate emissions from the stack serving these emissions units shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

47.83 lbs OC/day and 8.73 tons OC/year

Applicable Compliance Method:

Compliance with the daily emissions limitation shall be determined in accordance with the methodology established in d)(2)c. above. If required, the permittee shall demonstrate compliance with the daily emissions limit in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A, as applicable.

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for this emissions unit, compliance with the annual limitation shall also be demonstrated.

g) **Miscellaneous Requirements**

(1) None.



2. P019, Accessory Line #1

Operations, Property and/or Equipment Description:

Accessory Line (warm-up mill, extruder, and autoclave).

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 11/30/2001	Organic compound (OC) emissions shall not exceed 18.94 lbs/day and 3.46 tons/year See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-21-07(M)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be compliance with compliance with the lbs/day and tons/year limitations for OC established in b)(1)a.

Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 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.

- 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 State Implementation Plan.

BAT requirements also do not apply to the OC emissions from this air contaminant source since the uncontrolled potential to emit (PTE) is less than 10 tons per year. The PTE for OC is 3.46 tons/year and was calculated by summing the potential VOC emissions from the warm-up mill, the extruder, and the autoclave, as follows:

- i. Potential OC emissions from the warm-up mill were determined by multiplying an emission factor of 1.79 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (69,120 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs; and
- ii. Potential OC emissions from the extruder were determined by multiplying an emission factor of 8.30 E-06 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (69,120 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs; and
- iii. Potential OC emissions from the autoclave were determined by multiplying an emission factor of 8.68 E-05 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (69,120 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs.

*All OC is considered to be VOC.

- c. This emissions unit is not subject to the requirements of the rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.



e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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:

18.94 lbs OC/day and 3.46 tons OC/year

Applicable Compliance Method:

Compliance with the daily emissions limitation shall be determined in accordance with the methodology established in b)(2)b. above. If required, the permittee shall demonstrate compliance with the daily emissions limit in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A, as applicable.

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for this emissions unit, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Calendar Lines: P017,P018,

EU ID	Operations, Property and/or Equipment Description
P017	Calendar Line 1 (warm-up mill and calendar mill).
P018	Calendar Line 2 (warm-up mill and calendar mill).

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 11/30/2001	Organic compound (OC) emissions shall not exceed 27.19 lbs/day and 4.96 tons/year See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-21-07(M)	See b)(2)c.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be compliance with compliance with the lbs/day and tons/year limitations for OC established in b)(1)a.



Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 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.

- 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 State Implementation Plan.

BAT requirements also do not apply to the OC emissions from these air contaminant sources since the uncontrolled potential to emit (PTE) is less than 10 tons per year. The PTE for OC is 4.96 tons/year and was calculated by summing the potential VOC emissions from the warm-up mills and the calendar mills, as follows:

- i. Potential OC emissions from the calendar mills were determined by multiplying an emission factor of 1.06 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (95,423 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs; and
- ii. Potential OC emissions from the warm-up mills were determined by multiplying an emission factor of 1.79 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (95,423 lbs), 365 days/year, and a conversion factor of 1 ton/2000 lbs.

*All OC is considered to be VOC.

- c. These emissions units are not subject to the requirements of the rule because they do not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.



e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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:

27.19 lbs OC/day and 4.96 tons OC/year

Applicable Compliance Method:

Compliance with the daily emissions limitation shall be determined in accordance with the methodology established in b)(2)b. above. If required, the permittee shall demonstrate compliance with the daily emissions limit in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A, as applicable.

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for these emissions units, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.