



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

11/14/2014

Certified Mail

Neil Dalton
 Yokohama Industries Americas Ohio, Inc.
 1500 INDIANA ST
 SALEM, VA 24153

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

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

Facility ID: 0243110176
 Permit Number: P0117351
 Permit Type: Initial Installation
 County: Lake

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, Lake County News-Herald. 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,

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

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

PUBLIC NOTICE

11/14/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Yokohama Industries Americas Ohio, Inc.

471 NEWELL ST,
PAINESVILLE, OH 44077

Lake County

FACILITY DESC.: All Other Rubber Product Manufacturing

PERMIT #: P0117351

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial Installation of three emissions units for an FEPTIO facility with HAP emission limitations to avoid Title V: autoclave, silicone curing oven, and heated salt bath.

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Yokohama Industries Americas Ohio Inc. produces hoses and industrial products through extrusion, mixing, molding, and curing (silicone and sulfur).

3. Facility Emissions and Attainment Status:

According to Fee Emission Reports, actual emissions are below 10 TPY for VOC and facility-wide. With the new permit emissions for HAPs will be limited below 9.9 TPY for a single HAP and 24.9 TPY for total HAPs.

This facility is located in Lake County which is Nonattainment for eight-hour ozone and SO₂. The nonattainment status does not affect this facility.

4. Source Emissions:

With the new permit emissions for HAPs will be limited below 9.9 TPY for a single HAP and 24.9 TPY for total HAPs. Two new sources of VOC will be installed with PTE of 4.08 TPY (P009) and 5.76 TPY (P013).

5. Conclusion:

HAPs will be limited through facility-wide production limitations:
 2,000,000 pounds of sulfur cure EPDM (ethylene propylene diene monomer)
 7,000,000 pounds of finished throughput from the mixer.

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>
HAPs	9.9 single / 24.9 (PTE restriction)
VOC	9.84 (PTE)



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Yokohama Industries Americas Ohio, Inc.**

Facility ID:	0243110176
Permit Number:	P0117351
Permit Type:	Initial Installation
Issued:	11/14/2014
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
Yokohama Industries Americas Ohio, Inc.

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Draft Permit-to-Install and Operate

Yokohama Industries Americas Ohio, Inc.

Permit Number: P0117351

Facility ID: 0243110176

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0243110176
Application Number(s): A0050463, A0051874
Permit Number: P0117351
Permit Description: Initial Installation of three emissions units for an FEPTIO facility with HAP emission limitations to avoid Title V: autoclave, silicone curing oven, and heated salt bath.
Permit Type: Initial Installation
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/14/2014
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:

Yokohama Industries Americas Ohio, Inc.
471 NEWELL ST
PAINESVILLE, OH 44077

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: P0117351
Permit Description: Initial Installation of three emissions units for an FEPTIO facility with HAP emission limitations to avoid Title V: autoclave, silicone curing oven, and heated salt bath.

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

Emissions Unit ID:	P008
Company Equipment ID:	Autoclave
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Silicone-curing Oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Heated Salt Bath
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Yokohama Industries Americas Ohio, Inc.

Permit Number: P0117351

Facility ID: 0243110176

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
Yokohama Industries Americas Ohio, Inc.

Permit Number: P0117351

Facility ID: 0243110176

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) c) through g)

c) 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. 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	See c)(2).

(2) Additional Terms and Conditions

a. The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at this facility (listed in section B.1.c)(2)b below) shall not exceed 9.9 tons/year for any individual HAP or 24.9 tons/year for total combined HAPs.

b. The following list of emissions units at this facility emit HAPs: K001, K004, P001, P006, P007, P008, P009, P011, P012, P013, R003 and R004.

d) Operational Restrictions

(1) The maximum annual facility-wide production of sulfur cure EPDM shall not exceed 2,000,000 pounds per year based upon a rolling, 12-month summation of the material production rate. 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 sulfur cure EPDM production levels specified in the following table:



Effective Date: To be entered upon final issuance

Month(s)	Maximum Allowable Cumulative EPDM (pounds)
1	150,000
1-2	300,000
1-3	450,000
1-4	600,000
1-5	750,000
1-6	800,000
1-7	1,000,000
1-8	1,150,000
1-9	1,300,000
1-10	1,450,000
1-11	1,600,000
1-12	2,000,000

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

- (2) The maximum annual facility-wide finished throughput from the Mixer (P001) shall not exceed 7,000,000 pounds per year based upon a rolling, 12-month summation of the material production rate. 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 finished throughput from the Mixer specified in the following table:



Month(s)	Maximum Allowable Cumulative throughput from Mixer (pounds)
1	500,000
1-2	1,000,000
1-3	1,500,000
1-4	2,000,000
1-5	2,500,000
1-6	3,000,000
1-7	3,500,000
1-8	4,000,000
1-9	4,500,000
1-10	5,000,000
1-11	6,000,000
1-12	7,000,000

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

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

(1) The permittee shall maintain monthly records of the following information:

- a. the EPDM sulfur cure compound production for each month, in pounds;
- b. the finished product through the mixer for each month, in pounds;
- c. 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 EPDM sulfur cure compound material production figures; and



- d. 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 finished product through the mixer production figures.

f) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. any exceedance of the rolling, 12-month throughput limitations for EPDM sulfur cure and the finished product through the mixer; and
- b. the actual rolling, 12-month throughput levels for EPDM sulfur cure and finished product through the mixer.

If no deviations (excursion) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

g) Testing Requirements

- (1) Compliance with the emission limitations in B.1.c)(2)a. above shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Any individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

The facility-wide potential to emit (PTE) emissions have been calculated to be less than 9.9 tons/year for any individual HAP taking into consideration both throughput restrictions made enforceable in Section B.1 c)(2)d(1) and c)(2)(d)(2) for the facility.

The highest individual HAP, carbon disulfide, is calculated based on the following PTE from emissions units P008 and P013:

Given from P008:

300 lb/hr maximum throughput capacity

2,000,000 lb/yr maximum throughput limit

5.93E-03 lb/lb rubber emission factor



PTE = $5.93E-03$ lb/lb rubber x 2,000,000 lb./yr x 1/2000 lbs = 5.93 tons/yr carbon disulfide

Given from P013:

450 lb/hr maximum throughput capacity

2,000,000 lb/yr maximum throughput limit

$1.535E-03$ lb/lb rubber emission factor

PTE = $1.535E-03$ x 2,000,000 lb/yr x 1/2000 lbs = 1.53 tons/yr carbon disulfide

Total carbon disulfide PTE = 7.46 tons/yr

b. **Emission Limitation:**

Total combined HAPs emissions shall not exceed 24.9 tons per rolling, 12-month period from all facility emissions units.

Applicable Compliance Method:

The facility-wide potential to emit (PTE) emissions have been calculated to be less than 24.9 tons/year for any combination of HAP taking into consideration both throughput restrictions made enforceable in Section B.1 c)(2)d(1) and c)(2)(d)(2) for the facility.

Total Combined HAPs is calculated based on the following PTE:

Given from P008:

300 lb/hr maximum throughput capacity

$6.04E-03$ lb/lb rubber emission factor (total HAPs)

PTE = $6.04E-03$ lb/lb rubber x 300 lb/hr x 8,760 hrs x 1/2000 lbs = 7.93 tons/yr

Given from P009:

$1.74E-03$ lb/lb rubber total HAPs
(compound #22 assuming this as the total HAP in the process P009) Compound #8 is an EPDM that impedes silicone curing so carbon disulfide is not present

315 lb/hr @ 8,760 hours

PTE = $1.74E-03$ lb/lb rubber x 315 lbs/hr x 8,760 hrs x 1/2000 lbs = 2.40 tons/yr
Total HAPs

Given from P013:

$1.742E-03$ lb/lb rubber total HAPs



450 lb/hr @8,760 hours

$PTE = 1.742E-03 \text{ lb/lb rubber} \times 450 \text{ lbs/hr} \times 8,760 \text{ hrs} \times 1/2000 \text{ lbs} = 3.42 \text{ tons/yr}$
Total HAPs

Given from P001:

Banbury Mixer (P0107043)

1.40E-04 lb/lb rubber total HAPs

7,000,000 lbs throughput limit

$PTE = 1.40E-04 \text{ lb/lb} \times 7,000,000 \text{ lbs} \times 1/2000 \text{ lbs} = 0.49 \text{ ton/yr}$ Total HAPs

Given from P006:

Microwave cure (P0107043)

639 lb/hr maximum throughput capacity

0.001 lb/lb Rubber emission factor (Total HAPs)

$0.001 \text{ lb/lb rubber} \times 639 \text{ lb/hr} \times 8,760 \text{ hrs} \times 1/2000 \text{ lbs} = 2.80 \text{ tons/yr}$

Given from P007:

Autoclave (P0107043)

91 lb/hr maximum throughput capacity

6.04E-03 lb/lb Rubber emission factor (Total HAPs)

$PTE = 6.04E-03 \text{ lb/lb rubber} \times 91 \text{ lb/hr} \times 8,760 \text{ hrs} \times 1/2000 \text{ lbs} = 2.41 \text{ tons/yr}$

Given from K001:

ACH and PS Hose Mandrel Coating and Pretreatment (P0107043)

0.00043 lb/meter

3,760,480 meters (maximum production rate)

1617.01 total lbs

Toluene is 42% of solvent

$1617.01 \text{ lbs} \times 0.42 = 679.14 \text{ lbs/year} = 0.34 \text{ ton/yr}$



Given from K004:

PS Braided Hose Cementer (P0107043)

7,854 meters of PSA hose throughput

0.0079937 lbs/meter of PSA cemented

$7,854 \times 0.0079937 = 62.78 \text{ lbs/yr} = 0.03 \text{ ton/yr (actual)}$

297,829 units/yr max

62.78 lbs/ Toluene in cement

$297,829 / 7,854 \times 62.78 \text{ lbs/ Toluene} = 2381 \text{ lbs/yr}$

$2381 \text{ lbs/yr toluene} \times 1/2000 \text{ lbs} = 1.19 \text{ tons/yr (maximum)}$

Given from R003:

Cement Spray Paint Booth (P0107043)

871 Max gallons used

6.74 lb/gal total HAP used

$871 \text{ gallons} \times 6.74 \text{ lb/gal} = 5870.54 \text{ lbs/year} \times 1/2000 \text{ lbs} = 2.94 \text{ tons/yr}$

Given from R004:

PS/ACH Printer (P0107043)

Isophorone HAP

9.02 lbs/gal in ink solution with dilution of solvent at 70% adds a gallon with 1:1 ratio.

$.70 \times 2 \text{ gal} \times 9.02 \text{ lbs/gal} = 12.63 \text{ lbs/year HAPs} \times 1/2000 \text{ lbs} = 0.01 \text{ ton/yr}$

Given for P011:

Extruder 1 (de minimis)

450 lb/hr throughput

3.52E-05 lb/lb Rubber total worst case HAPs emission factor

$450 \text{ lb/hr} \times 3.52\text{E-}05 \text{ lb/lb} \times 8,760 \times 1/2000 = 0.069 \text{ ton/yr}$



Draft Permit-to-Install and Operate
Yokohama Industries Americas Ohio, Inc.

Permit Number: P0117351

Facility ID: 0243110176

Effective Date: To be entered upon final issuance

Given for P012:

Extruder 2 (de minimis)

315 lb/hr throughput

3.52E-05 lb/lb Rubber total worst case HAPs emission factor

$315 \text{ lb/hr} \times 3.52\text{E-}05 \text{ lb/lb} \times 8,760 \times 1/2000 = 0.049 \text{ ton/yr}$



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C. Emissions Unit Terms and Conditions



1. P008, Autoclave

Operations, Property and/or Equipment Description:

Autoclave 4 foot x 20 foot

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. d)(1), d)(2), d)(3), d)(4), e)(2) and e)(3)

(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(D) Synthetic Minor to Avoid Title V	See B.1.c).
b.	ORC 3704.03(F)(4)(d)	See d)(1), d)(2), d)(3), d)(4) and e)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P008 and P013, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

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

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

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

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

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

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



Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 31

Maximum Hourly Emission Rate (lbs/hr): 0.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 25.24

MAGLC (ug/m³): 738

The permittee, has demonstrated that emissions of carbon disulfide, from emissions unit(s) P008 and P013, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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



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- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) **Reporting Requirements**
- (1) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



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- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. See B.1.e).

- g) Miscellaneous Requirements
 - (1) None.



2. P009, Silicone-curing Oven

Operations, Property and/or Equipment Description:

Silicone-Curing Oven With Hot Air Cure (HAC), 1,700 °F max. temp.

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. e)(2)

(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)	Volatile organic compound (VOC) emissions shall not exceed 0.34 ton per month on a rolling, 12-month period. See b)(2)a and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/yr. See b)(2)b.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See B.1.c).



- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
 - c. The VOC emission limitation identified in b)(1)a has been established to reflect the potential to emit for VOC. It is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 0.34 ton per month on a rolling, 12-month period.

Applicable Compliance Method:

The ton per month VOC emission limitation based on a rolling, 12-month period was developed by multiplying the calculated short-term VOC emission rate (0.926 lb/hr) by the maximum annual hours operation (8,760 hours), and then dividing by 2,000 lbs per ton and 12 months per year.

If required, verification of the calculated short-term VOC emission rate may be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A.

g) Miscellaneous Requirements

(1) None.



3. P013, Heated Salt Bath

Operations, Property and/or Equipment Description:

Heated Salt Bath

- 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. d)(1), d)(2), d)(3), d)(4), e)(2) and e)(3)
 - (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)	Volatile organic compound (VOC) emissions shall not exceed 0.48 ton per month on a rolling, 12-month period. See b)(2)a and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to VOC emissions from this source since the potential to emit is less than 10 tons/yr. See b)(2)b.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See B.1.c).
d.	ORC 3704.03(F)(4)(d)	See d)(1), d)(2), d)(3), d)(4) and e)(3).



(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The VOC emission limitation identified in b)(1)a has been established to reflect the potential to emit for VOC. It is not necessary to establish monitoring, record keeping, or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P008 and P013, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological



Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Carbon Disulfide

TLV (mg/m3): 31

Maximum Hourly Emission Rate (lbs/hr): 0.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.24

MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of carbon disulfide, from emissions unit(s) P008 and P013, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

e) Reporting Requirements

- (1) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 0.48 ton per month on a rolling, 12-month period.

Applicable Compliance Method:

The ton per month VOC emission limitation based on a rolling, 12-month period was developed by multiplying the calculated short-term VOC emission rate (1.32 lbs/hr) by the maximum annual hours operation (8,760 hours), and then dividing by 2,000 lbs per ton and 12 months per year.

If required, verification of the calculated short-term VOC emission rate may be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A.



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g) Miscellaneous Requirements

(1) None.