



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

6/26/2015

Eugene Gormley  
 Trelleborg Sealing Profiles NA  
 500 Lena Drive  
 Aurora, OH 44202

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

Facility ID: 1667080043  
 Permit Number: P0118830  
 Permit Type: Initial Installation  
 County: Portage

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Record Courier. 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](http://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 Akron Regional Air Quality Management District  
 1867 West Market St.  
 Akron, OH 44313

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael E. Hopkins, P.E.  
 Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 ARAQMD; Pennsylvania; West Virginia; Canada



## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation  
Trelleborg Sealing Profiles NA

1780 Miller Pkwy,, Streetsboro, OH 44241

ID#:P0118830

Date of Action: 6/26/2015

Permit Desc:Initial installation FEPTIO for a silicone extrusion line consisting of a silicone hopper, extruder, salt bath curing line and infrared heating units..

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 ID # or: Megan Talcott, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. **Source Description:** Trelleborg Sealing Profiles North America manufactures extruded rubber/silicone synthetic sealing materials in its manufacturing plant located at 1780 Miller Parkway in Streetsboro, Ohio. The facility currently consists of six rubber/silicone extrusion lines (emissions unit P001-P006) and two dedicated silicone extrusion lines (emissions units P007 and P008), permitted by federally enforceable permit-to-install and operate (FEPTIO) P0115226. This permit is for the initial installation of another dedicated silicone extrusion line (P009).
3. **Facility Emissions and Attainment Status:** The facility has a potential to emit that exceeds the TV thresholds for individual hazardous air pollutant (HAP) and total combined HAPs. The facility's potential to emit for volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), particulate emissions (PE), and carbon monoxide (CO) are under the Title V thresholds. The facility is located in Portage County, which is in attainment for all criteria air pollutants, except particulate matter with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>) and ozone.
4. **Source Emissions:** The facility will continue to restrict the production of ethylene propylene diene monomer (EPDM) to 30,000,000 pounds per year to meet the facility-wide emission limits of 9.88 tons of any individual HAP and 24.0 tons of total combined HAPs per year, based on a rolling, 12-month summation of the monthly emissions.
5. **Conclusion:** Continued compliance with the annual EPDM production restriction, in accordance with the associated monitoring, recordkeeping and reporting requirements, will ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to HAP emissions.
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>
Individual HAP	9.88
Combined HAPs	24.0
VOC	4.08





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Trelleborg Sealing Profiles NA**

Facility ID:	1667080043
Permit Number:	P0118830
Permit Type:	Initial Installation
Issued:	6/26/2015
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  
Trelleborg Sealing Profiles NA

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**Draft Permit-to-Install and Operate**

Trelleborg Sealing Profiles NA

**Permit Number:** P0118830

**Facility ID:** 1667080043

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

## Authorization

Facility ID: 1667080043  
Application Number(s): A0053145  
Permit Number: P0118830  
Permit Description: Initial installation FEPTIO for a silicone extrusion line consisting of a silicone hopper, extruder, salt bath curing line and infrared heating units.  
Permit Type: Initial Installation  
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 6/26/2015  
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:

Trelleborg Sealing Profiles NA  
1780 Miller Pkwy  
Streetsboro, OH 44241

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:

Akron Regional Air Quality Management District  
1867 West Market St.  
Akron, OH 44313  
(330)375-2480

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



**Draft Permit-to-Install and Operate**

Trelleborg Sealing Profiles NA

**Permit Number:** P0118830

**Facility ID:** 1667080043

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

## Authorization (continued)

Permit Number: P0118830

Permit Description: Initial installation FEPTIO for a silicone extrusion line consisting of a silicone hopper, extruder, salt bath curing line and infrared heating units.

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

<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	Line 9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**

Trelleborg Sealing Profiles NA

**Permit Number:** P0118830

**Facility ID:** 1667080043

**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 Akron Regional Air Quality Management District 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**  
Trelleborg Sealing Profiles NA  
**Permit Number:** P0118830  
**Facility ID:** 1667080043  
**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) B.2. through B.5.
2. The emissions from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009 and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons of any individual hazardous air pollutant (HAP) per year and 24.0 tons of total combined HAPs per year based upon rolling, 12-month summations of the monthly emissions.
3. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, P008 and P009, combined:
  - a) the production rate for each product for each month, in pounds;
  - b) the total individual HAP emissions for each HAP, in tons per month [i.e., the sum of B.3.a) times (Y\*) for each product plus (Z\*\*) divided by 12, and then dividing by 2000 pounds per ton];
  - c) the total combined HAPs emissions, in tons per month [i.e., the sum of the total individual HAP emissions in B.3.b)];
  - d) the rolling, 12-month summation of each individual HAP emissions, in tons [i.e., the sum of the individual HAP emissions, as recorded in B.3.b) above, for the present month and the previous eleven months of operation]; and
  - e) the rolling, 12-month summation of total combined HAPs emissions, in tons [i.e. the sum of the total combined HAPs emissions, as recorded in B.3.c) above, for the present month and the previous eleven months of operation].

\*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

\*\*Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.
4. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- (1) the rolling, 12-month emission limitation of 9.88 tons of any individual HAP from the entire facility ; and
  - (2) the rolling, 12-month emission limitation of 24.0 tons of total combined HAPs from the entire facility .
- b) the probable cause of each deviation (excursion);
  - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d) the magnitude and duration of each deviation (excursion).

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

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).

5. Compliance with the facility-wide emission limitations shall be determined in accordance with the following methods:

- a) Emission Limitations:

9.88 tons of any individual HAP per rolling, 12-month period

24.0 tons of total combined HAPs per rolling, 12-month period

Applicable Compliance Method:

Compliance with the HAP emission limitations identified above shall be demonstrated through the record keeping requirements in B.3.



**Draft Permit-to-Install and Operate**  
Trelleborg Sealing Profiles NA  
**Permit Number:** P0118830  
**Facility ID:** 1667080043  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**

**1. P009, Line 9**

**Operations, Property and/or Equipment Description:**

Silicone extrusion line consisting of a silicone hopper, extruder, salt bath curing line and infrared heating units.

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) June 30, 2008	<p>Volatile organic compound (VOC) emissions shall not exceed 0.34 ton per month averaged over a 12-month rolling period.</p> <p>See b)(2)a and b)(2)b.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology Requirements (BAT) under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year.</p> <p>See b)(2)c.</p>
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See B.1. through B.5. and c)(1).
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the stack serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 1.83 pounds per hour.

(2) Additional Terms and Conditions

- a. The VOC emissions limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with the emission limitation.
- b. 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).
- c. 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) Operational Restrictions

- (1) This emissions unit shall only manufacturer silicone products.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of all time periods during which the permittee manufactured products other than silicone in this emissions unit.
- (2) 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 stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. The color of the emissions;
  - b. Whether the emissions are representative of normal operations;
  - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. The total duration of any visible emissions incident; and
  - e. Any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all time periods during which the permittee manufactured products other than silicone in this emissions unit.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted 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).

(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 also 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 emission unit; and
- b. Any corrective actions taken to 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 action(s) 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.

(4) 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 section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

VOC emissions shall not exceed 0.34 ton per month averaged over a 12-month rolling period.

Applicable Compliance Methods:

Compliance with the allowable VOC emissions limitation identified above was determined using the worst-case emission factor of 0.001556 pound of VOC per pound of rubber\* and the emissions unit's maximum hourly production rate as follows:

$$(0.001556 \text{ lb VOC/lb rubber})(600 \text{ lbs/hr})(8760 \text{ hrs/yr})(1 \text{ ton}/2000 \text{ lbs})(1\text{yr}/12\text{months})$$

\*The sum of the extrusion and hot air curing VOC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10, Compound #19.

b. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the opacity limitation identified above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(1).



c. Emission Limitation:

PE shall not exceed 1.83 pounds per hour.

Applicable Compliance Method:

If required, compliance with the annual emissions limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.