



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

7/2/2015

Certified Mail

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

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0374010077
 Permit Number: P0118448
 Permit Type: Renewal
 County: Seneca

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

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

Sincerely,



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

Cc: Ohio EPA-NWDO



FINAL

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

Facility ID:	0374010077
Permit Number:	P0118448
Permit Type:	Renewal
Issued:	7/2/2015
Effective:	7/2/2015
Expiration:	7/2/2025



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

for
Roppe Corporation

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Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0118448
Facility ID: 0374010077
Effective Date: 7/2/2015

Authorization

Facility ID: 0374010077
Application Number(s): A0052812, A0052815, A0052816, A0052887
Permit Number: P0118448
Permit Description: Renewal of PTIO for a fabricated rubber products manufacturing facility.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/2/2015
Effective Date: 7/2/2015
Expiration Date: 7/2/2025
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

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

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118448
 Permit Description: Renewal of PTIO for a fabricated rubber products manufacturing facility.

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

- | | |
|-----------------------------------|--|
| Emissions Unit ID: | P016 |
| Company Equipment ID: | Mixer #3 |
| Superseded Permit Number: | P0117388 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P019 |
| Company Equipment ID: | Accessory Line #1 |
| Superseded Permit Number: | P0117388 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P020 |
| Company Equipment ID: | Mixer #2 |
| Superseded Permit Number: | P0110343 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P022 |
| Company Equipment ID: | Kon Kure #2 with autoclave, extruder, and mill |
| Superseded Permit Number: | P0110298 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P023 |
| Company Equipment ID: | Kon Kure #3 with autoclave, extruder, and mill |
| Superseded Permit Number: | P0110298 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P901 |
| Company Equipment ID: | blender/compounders for mixers |
| Superseded Permit Number: | P0108323 |
| General Permit Category and Type: | Not Applicable |

Group Name: Group 1

Emissions Unit ID:	P017
Company Equipment ID:	Calender line #1
Superseded Permit Number:	P0117388
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Calender Line #2
Superseded Permit Number:	P0117388
General Permit Category and Type:	Not Applicable

Group Name: Group 2

Emissions Unit ID:	R001
Company Equipment ID:	Kon Kure #2
Superseded Permit Number:	P0108323
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Corner Booth
Superseded Permit Number:	P0108323



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0118448
Facility ID: 0374010077
Effective Date: 7/2/2015

General Permit Category andType:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Kon Kure #3
Superseded Permit Number:	P0108323
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0118448
Facility ID: 0374010077
Effective Date: 7/2/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0118448
Facility ID: 0374010077
Effective Date: 7/2/2015

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Roppe Corporation
Permit Number: P0118448
Facility ID: 0374010077
Effective Date: 7/2/2015

C. Emissions Unit Terms and Conditions



1. P016, Mixer #3

Operations, Property and/or Equipment Description:

Banbury Mixing Operation (banbury mixer 3, warm-up mill, conveyors, and cooling racks) with baghouse.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	Particulate matter equal to or less than 10 microns in diameter (PM10) shall not exceed 1.82 lbs/hr and 7.97 tons/yr Visible particulate emissions from the stack serving this emissions unit shall not exceed 0% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Organic compound (OC) emissions shall not exceed 47.83 lbs/day and 8.73 tons/year See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.



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

(2) Additional Terms and Conditions

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

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

All emissions are considered to be PM10.

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

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

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

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

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

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

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

- i. Potential OC emissions from the mixer were determined by multiplying an emission factor of 1.23 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum number of batches per 24-hour period (288), the maximum weight of a batch (550 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs; and
- ii. Potential OC emissions from the warm-up mill were determined by multiplying an emission factor of 1.79 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum number of batches per 24-hour period (288), the maximum weight of a batch (550 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs.

*All OC is considered to be VOC.

- d. The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
- e. This emissions unit is not subject to the requirements of the rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements [see b)(2)a.):
 - a. Emissions units P016 shall be vented to a dust collector, capable of achieving a control efficiency of 95.0% for captured particulate matter.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken eliminate the visible particulate emissions.

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

- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

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

Applicable Compliance Method:

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



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

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for this emissions unit, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

47.83 lbs OC/day and 8.73 tons OC/year

Applicable Compliance Method:

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

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for this emissions unit, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.

2. P019, Accessory Line #1

Operations, Property and/or Equipment Description:

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

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

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

(2) Additional Terms and Conditions

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

Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30,

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

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

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

- i. Potential OC emissions from the warm-up mill were determined by multiplying an emission factor of 1.79 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (69,120 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs; and
- ii. Potential OC emissions from the extruder were determined by multiplying an emission factor of 8.30 E-06 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (69,120 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs; and
- iii. Potential OC emissions from the autoclave were determined by multiplying an emission factor of 8.68 E-05 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (69,120 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs.

*All OC is considered to be VOC.

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

- (1) The 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.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

a. Emission Limitation:

18.94 lbs OC/day and 3.46 tons OC/year

Applicable Compliance Method:

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

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for this emissions unit, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.



3. P020, Mixer #2

Operations, Property and/or Equipment Description:

Mixer 2 including warm-up mill, super sack station, and cooling rack.

- 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)	22.67 lbs organic compound (OC)/day & 4.14 tons OC/yr from mixing operations [See b)(2)c.] 33.00 lbs OC/day & 6.02 tons OC/yr from milling operations [See b)(2)c.] 1.66 lbs particulate emissions (PE)/hr & 7.27 tons PE/yr from mixing operations [See b)(2)a.] Visible emissions shall not exceed 0% opacity, as a six-minute average from the baghouse exhaust
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.

- (2) Additional Terms and Conditions
 - a. All PE from this emissions unit is assumed to be particulate matter less than 10 microns (PM10)
 - b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
 - c. The emission limitations of 22.67 lbs OC/day from mixing operations and 33.00 lbs OC/day from milling operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information for emissions unit P020:
 - a. batches per month;
 - b. pounds of material per batch;
 - c. the OC emissions rate from mixing operations, in lbs/month $[d)(1)a. \times d)(1)b. \times 0.000123 \text{ lb OC/lb material mixed}]$;
 - d. the OC emissions rate from milling operations, in lbs/month $[d)(1)a. \times d)(1)b. \times 0.000179 \text{ lb OC/lb material milled}]$;
 - e. the annual, year-to-date OC emissions from mixing operations (summation of $d)(1)c.$ for each calendar month to date from January to December); and
 - f. the annual, year-to-date OC emissions from milling operations (summation of $d)(1)d.$ for each calendar month to date from January to December).
 - (2) The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible particulate emissions from the exhaust of the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visual emissions in term d)(2) above.
 - a. all days during which any visible particulate emissions were observed from the stack serving this 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 were 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.

- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

a. Emission Limitation:

22.67 lbs OC/day from mixing operations

Applicable Compliance Method:

The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

(The maximum daily batches, as specified in the permit application) x (the maximum pounds of rubber per batch, as specified in the permit application) x (an emission factor of 0.000123 lb OC/lb rubber from AP-42 4.12, Draft 6/99 for Compound #22), which has the most similar rubber formula to the permittee's process.

b. Emission Limitation:

33.00 lbs OC/day from milling operations

Applicable Compliance Method:

The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

(The maximum daily batches, as specified in the permit application) x (the maximum pounds of rubber per batch, as specified in the permit application) x (an emission factor of 0.000179 lb OC/lb rubber from AP-42 4.12, Draft 6/99 for Compound #22), which has the most similar rubber formula to the permittee's process.

c. Emission Limitation:

4.14 tons OC/yr from mixing operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

d. Emission Limitation:

6.02 tons OC/yr from milling operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

e. Emission Limitation:

1.66 lbs PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the emission limitation by multiplying the hourly uncontrolled mass rate of emissions [based on a process weight rate, in pounds rubber processed/hour, an uncontrolled release rate of 0.5% from clay, rubber, and rubber chemicals (engineering judgment) and an uncontrolled release rate of 0.05% from process oil (engineering judgment)], by a minimum control efficiency of 95% for clay, rubber, and rubber chemicals and 90% for process oil. If required, compliance shall be determined in accordance with the test methods and procedures in Methods 1 - 5 of 40 CFR, Part 60, Appendix A.



f. Emission Limitation:

7.27 tons PE/yr

Applicable Compliance Method:

The annual limit was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hours per year and dividing by 2,000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

g. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

4. P022, Kon Kure #2 with autoclave, extruder, and mill

Operations, Property and/or Equipment Description:

Kon Kure line 2 with autoclave, extruder, and mill.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	18.36 lbs organic compounds (OC)/day & 3.35 tons OC/yr from milling operations [See b)(2)a.] 9.75 lbs OC/day & 1.78 tons OC/yr from extruding and curing operations [See b)(2)a].

(2) Additional Terms and Conditions

a. The emission limitations of 18.36 lbs OC/day from milling operations and 9.75 lbs OC/day from extruding and curing operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions unit P022:
 - a. pounds each of rubber milled, extruded, and cured;
 - b. the OC emissions rate from milling operations, in lbs/month [d)(1)a. x 0.000179 lb OC/lb material milled];
 - c. the OC emissions rate from extruding operations and curing operations, in lbs/month [d)(1)a. x 0.0000083 lb OC/lb material extruded + d)(1)a. x 0.00000868 lb OC/lb material cured];
 - d. the annual, year-to-date OC emissions from milling operations [summation of d)(1)b. for each calendar month to date from January to December]; and
 - e. the annual, year-to-date OC emissions from extruding and curing operations [summation of d)(1)c. for each calendar month to date from January to December].

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

a. Emission Limitation:

18.36 lbs OC/day from milling operations

Applicable Compliance Method:

The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:



The maximum lbs rubber milled/day x an emission factor of 0.000179 lb OC/lb rubber milled from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

b. Emission Limitation:

9.75 lbs OC/day from extruding and curing operations

Applicable Compliance Method:

The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber extruded/day x an emission factor of 0.0000083 lb OC/lb rubber extruded + the maximum lbs rubber cured/day x and emission factor of 0.00000868 lb OC/lb rubber cured. Emission factors from AP-42 4.12, Draft 6/99 for Compound #22 which has the most similar rubber formula to the permittees process.

c. Emission Limitation:

3.35 tons OC/yr from milling operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

d. Emission Limitation:

1.78 tons OC/yr from extruding and curing operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.

5. P023, Kon Kure #3 with autoclave, extruder, and mill

Operations, Property and/or Equipment Description:

Kon Kure line 3 with autoclave, extruder, and mill.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	18.36 lbs organic compounds (OC)/day & 3.35 tons OC/yr from milling operations [See b)(2)a.] 9.75 lbs OC/day & 1.78 tons OC/yr from extruding and curing operations [See b)(2)a.]

(2) Additional Terms and Conditions

a. The emission limitations of 18.36 lbs OC/day from milling operations and 9.75 lbs OC/day from extruding and curing operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information for emissions unit P023:
 - a. pounds each of rubber milled, extruded, and cured;
 - b. the OC emissions rate from milling operations, in lbs/month [d)(1)a. x 0.000179 lb OC/lb material milled];
 - c. the OC emissions rate from extruding operations and curing operations, in lbs/month [d)(1)a x 0.0000083 lb OC/lb material extruded + d)(1)a. x 0.00000868 lb OC/lb material cured];
 - d. the annual, year-to-date OC emissions from milling operations [summation of d)(1)b. for each calendar month to date from January to December]; and
 - e. the annual, year-to-date OC emissions from extruding and curing operations [summation of d)(1)c. for each calendar month to date from January to December].
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
 - (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
18.36 lbs OC/day from milling operations

Applicable Compliance Method:

The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.



*The potential to emit was based on the following:

The maximum lbs rubber milled/day x an emission factor of 0.000179 lb OC/lb rubber milled from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

b. Emission Limitation:

9.75 lbs OC/day from extruding and curing operations

Applicable Compliance Method:

The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber extruded/day x an emission factor of 0.0000083 lb OC/lb rubber extruded + the maximum lbs rubber cured/day x and emission factor of 0.00000868 lb OC/lb rubber cured. Emission factors from AP-42 4.12, Draft 6/99 for Compound #22 which has the most similar rubber formula to the permittees process.

c. Emission Limitation:

3.35 tons OC/yr from milling operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

d. Emission Limitation:

1.78 tons OC/yr from extruding and curing operations

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.

6. P901, blender/compounders for mixers

Operations, Property and/or Equipment Description:

blender/compounders for mixers with dust collection system

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	0.28 pound particulate matter less than or equal to 10 microns (PM10)/hour and 1.24 tons PM10/year Visible particulate emissions (PE) from the dust collector serving this emissions unit shall not exceed 0% opacity, as a six minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:
- i. 0.28 pound PM₁₀/hour and 1.24 tons PM₁₀/year; and
 - ii. visible PE from any stack serving this emissions unit shall not exceed 0% opacity, as a six minute average.

All emissions of particulate matter from the dust collector stack are PM₁₀.

The capture system for the dust collector does not achieve 100% capture efficiency from the blending/compounding operation; however, fugitive particulate emissions are negligible and therefore have not been addressed in this permit. Additionally the negligible amount of un-captured PE will be controlled by the building containing this emissions unit.

- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

It should be noted that the voluntary restrictions were established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

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

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

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].
- e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:

- a. This emissions unit shall be vented to a dust collection system capable of achieving a maximum outlet concentration of 0.01 gr/dscf for PM₁₀.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack of the dust collector serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

- a. all days during which any visible particulate emissions were observed; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were 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.

- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

- a. Emission Limitation:

0.01 gr PM10/dscf

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the dust collector. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- b. Emission Limitation:

0.28 pound PM10/hour

Applicable Compliance Method:

The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.01 gr PM10/dscf and the maximum volumetric air flow rate (3,300 acfm) from this emissions unit to the fabric filter, and using the following conversion factors in order to convert to pounds per hour: 1 pound/7000 grains and 60 minutes/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

c. Emission Limitation:

1.24 tons PM10/year

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 0% opacity, as a six minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Group 1: P017,P018,

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

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

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

(2) Additional Terms and Conditions

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

Therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30,



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

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

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

- i. Potential OC emissions from the calendar mills were determined by multiplying an emission factor of 1.06 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (95,423 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs; and
- ii. Potential OC emissions from the warm-up mills were determined by multiplying an emission factor of 1.79 E-04 lb OC/lb rubber processed (AP-42, Chapter 4.12, Draft 6/99) by the maximum amount of rubber processed per 24-hour period (95,423 lbs), 365 days/year, and a conversion factor of 1 ton/2,000 lbs.

*All OC is considered to be VOC.

- c. These emissions units are not subject to the requirements of the rule because they do not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) The 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.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

- a. Emission Limitation:

27.19 lbs OC/day and 4.96 tons OC/year

Applicable Compliance Method:

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

The annual limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8,760 hrs/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown the hourly emission limitation for these emissions units, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.

8. Emissions Unit Group -Group 2: R001,R003,R004,

EU ID	Operations, Property and/or Equipment Description
R001	Kon Kure #2: Rubber UV Coating Line
R003	Corner Booth: Rubber UV Coating Line
R004	Kon Kure #3: Rubber UV Coating Line

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. b)(1)c.; d)(8) through d)(11); and 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)(a)	See b)(2)a. <u>Combined Emission Limits for R001, R003, and R004:</u> <u>Coating Operation</u> 4.29 pounds organic compounds (OC)/hour; 18.78 tons OC/year <u>Cleanup Operation</u> 45.24 pounds OC/month; 0.27 tons OC/year
b.	OAC rule 3745-17-11(C)	See b)(2)b., c)(1) and c)(2), and d)(3) through d)(7).
c.	OAC rule 3745-114-01	Toxic Air Contaminants [See d)(8) through d)(11) and e)(2).]

- (2) Additional Terms and Conditions
 - a. For the purpose of federal enforceability, OC emissions will effectively restrict volatile organic compounds (VOC) emissions.
 - b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- c) Operational Restrictions
 - (1) The permittee shall install, operate, and maintain dry particulate filter system(s) for the surface coating operation(s) in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter(s) shall be employed during all periods of coating application to control particulate emissions.
 - (2) The permittee shall expeditiously repair the dry particulate filter(s) or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device(s) is/are not operating in accordance with these requirements.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for the coating operations associated with emissions units R001, R003, and R004, combined:
 - a. the name and identification number of each coating employed;
 - b. the OC content, in pounds per gallon, of each coating, as applied;
 - c. the volume, in gallons, of each coating employed;
 - d. the OC emission rate, in pounds/month, for each coating employed [d)(1)b. times d)(1)c.] for each calendar month;
 - e. the summation of the monthly OC emission rates, in pounds/month, for all coatings employed [sum of d)(1)d.] for each calendar month; and
 - f. the annual year-to-date OC emission rate, in tons/year, for all coatings employed [sum of d)(1)e. divided by 2,000 pounds/ton] for each calendar month-to-date, based on the 12-month reporting period established in the permittee's annual Permit Evaluation Report (PER).
 - (2) The permittee shall collect and record the following information annually for the cleanup operation associated with emissions units R001, R003, and R004, combined:
 - a. the name and identification number of each cleanup material employed;
 - b. the OC content, in pounds per gallon, of each cleanup material;
 - c. the volume, in gallons, of each cleanup material employed;

- d. the annual OC emission rate, in tons/year, for each cleanup material employed [d)(2)b. times d)(2)c. divided by 2,000 pounds/ton] for each 12-month reporting period, based on the 12-month reporting period established in the permittee's annual Permit Evaluation Report (PER); and
 - e. the annual OC emission rate, in tons/year, for all cleanup materials employed [sum of d)(2)d.] for each 12-month reporting period, based on the 12-month reporting period established in the permittee's annual Permit Evaluation Report (PER).
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for each dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (4) The permittee shall conduct periodic inspections of each dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
 - (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of each dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - (6) The permittee shall document each inspection (periodic and annual) of each dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (8) The PTIO application for these emissions units, R001, R003, and R004, 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., 24 hours per day and 7 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):

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

- 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: 2-Butoxyethanol (EGBE)

TLV (mg/m³): 96.66

Maximum Hourly Emission Rate (lbs/hr): 4.29

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 98.67

MAGLC (µg/m³): 2,301.49

The permittee, has demonstrated that emissions of 2-butoxyethanol, from emissions unit(s) R001, R003, and R004, 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).

- (9) 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 PTIO 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.

- (10) 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.
- (11) 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 District Office or Local Air Agency 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.
 - (2) 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.
 - (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

4.29 pounds OC/hour from coating operations for R001, R003, and R004, combined

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit of emissions units R001, R003, and R004, combined; therefore, no hourly monitoring and recordkeeping or reporting requirements are necessary to verify compliance. The emission limit was established in accordance with the following equation:

0.55 pound OC ⁽¹⁾	2.6 gallons ⁽²⁾	3 booths
gallon	hour	

- (1) Maximum OC content coating employed in each booth.
- (2) Maximum coating usage rate for each booth.

b. Emission Limitation:

18.78 tons OC/year from coating operations for R001, R003, and R004, combined

Applicable Compliance Method:

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

4.29 pounds OC ⁽¹⁾	8,760 hours ⁽²⁾	1 ton ⁽³⁾
hour	year	2000 pounds

- (1) Hourly potential to emit of emissions unit.
- (2) Maximum annual operating schedule.
- (3) Pound to ton conversion factor.

Compliance shall be demonstrated in accordance with the recordkeeping requirements established in d)(1).

c. Emission Limitation:

0.27 ton OC/year from cleanup operations for R001, R003, and R004, combined

Applicable Compliance Method:

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

7.54 pounds OC ⁽¹⁾	55 gallons ⁽²⁾	1 ton ⁽³⁾
gallon	year	2000 pounds

- (1) Maximum OC content cleanup employed in each booth.
- (2) Maximum cleanup usage rate for R001, R003, and R004, combined.



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(3) Pound to ton conversion factor.

Compliance shall be demonstrated in accordance with the recordkeeping requirements established in d)(2).

g) Miscellaneous Requirements

(1) None.