



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WARREN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05818

Fac ID: 1483100458

DATE: 4/13/2006

Ziegler Tire, Inc.
William Ziegler
4150 Millenium Blvd., SE
Massillon, OH 446460000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 4/13/2006
Effective Date: 4/13/2006**

FINAL PERMIT TO INSTALL 14-05818

Application Number: 14-05818
Facility ID: 1483100458
Permit Fee: **\$400**
Name of Facility: Ziegler Tire, Inc.
Person to Contact: William Ziegler
Address: 4150 Millenium Blvd., SE
Massillon, OH 446460000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1100 Reed Road
Monroe, OH, Ohio**

Description of proposed emissions unit(s):
Installation of new tire tread removal, repair, building, and curing operations.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM10	5.26
OC	16.91

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Tire buffing units (2) with fabric filter and maximum production rate of 25 tires per hour	OAC rule 3745-31-05(A)(3)	Particulate emissions and particulate matter emissions 10 microns and less in diameter (PE/PM10) shall not exceed 1.2 pounds per hour and 5.26 tons per year.
		Organic compound (OC) emissions shall not exceed 0.16 pound per hour and 0.70 ton per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	See term and condition A.2.b.
		Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than

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Issue:

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Emissions Unit ID: P001

the emission limitation
established pursuant to OAC
rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a The hourly emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with the hourly emissions limitations.
- 2.b All of the emissions from this emissions unit shall be captured and vented through the fabric filter and the emissions unit shall not generate any fugitive particulate emissions.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the permitted visible emissions limitation, mass emissions limitations and the use of the fabric filter.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the number of tires processed per month for the purpose of determining the annual emissions.

D. Reporting Requirements

- 1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total organic compound emissions and particulate emissions from this emissions unit from the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

- 1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitations:
Particulate emissions and particulate matter emissions 10 microns and less in diameter (PE/PM10) shall not exceed 1.2 pounds per hour and 5.26 tons per

year

Applicable Compliance Method:

Compliance with the pounds per hour and tons per year PE and PM10 emissions limitations in section A.1. shall be demonstrated by calculations using the emission factors from US EPA AP-42 Fifth Edition, Table 4.12-12, (Draft section, June 1999) and the permittee-provided fabric filter control efficiency and production data contained in PTI application 14-05818, as submitted on February 16, 2006.

The Applicable Emissions Limitations/Control Measures in Part A.1 were developed as follows:

$$\text{PE/PM10 Emissions (lbs/hr)} = [(\text{tires/hr}) \times (\text{lbs rubber/tire}) \times (\text{lb PE/PM10/lb rubber}) \times \{1 - (\text{fabric filter efficiency}/100)\}]$$

$$\text{PE/PM10 Emissions (TPY)} = [\{\text{PE/PM10 Emissions (lbs/hr)}\} \times (8760 \text{ hrs/Year}) \times (\text{Ton}/2000 \text{ lbs})]$$

b. Emissions Limitations:

Organic compound (OC) emissions shall not exceed 0.16 pound per hour and 0.70 ton per year

Applicable Compliance Method:

Compliance with the pounds per hour and tons per year OC emissions limitations in section A.1. shall be demonstrated by calculations using the emission factors from US EPA AP-42 Fifth Edition, Table 4.12-12, (Draft section, June 1999) and the permittee-provided production data contained in PTI application 14-05818, as submitted on February 16, 2006.

The Applicable Emissions Limitations/Control Measures in Part A.1 were developed as follows:

$$\text{OC Emissions (lbs/hr)} = [(\text{tires/hr}) \times (\text{lbs rubber/tire}) \times (\text{lbs OC/lb rubber})]$$

$$\text{OC Emissions (TPY)} = [\{\text{OC Emissions (lbs/hr)}\} \times (8760 \text{ hrs/Year}) \times (\text{Ton}/2000 \text{ lbs})]$$

c. Emissions Limitation:

Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average except as specified by rule.

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Repairing and Dissolution Application Units (2) with a maximum production rate of 25 tires per hour	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.7 pounds per hour and 16.21 tons per year.
	OAC rule 3745-21-07(G)(2)	Exempt from requirements; see term and condition B.1.

2. Additional Terms and Conditions

- 2.a The hourly emissions limitation specified above represents the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with the hourly emissions limitation.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the mass emissions limitations and the photochemically reactive materials prohibition.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to and obtain approval from the Hamilton County Department of Environmental Services. Such notification shall include information sufficient to

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determine that the emissions associated with the proposed change in materials will

comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information monthly for the purpose of determining annual OC emissions:
 - a. the number of tires processed per month;
 - b. the company identification for each coating employed;
 - c. the number of pounds of coating (rubber dissolution) applied;
 - d. the organic compound content of the coating (rubber dissolution), in percent (%) by weight (lb OC/lb coating);
 - e. the total organic compound emission rate for the coating (rubber dissolution), in pounds per month (c. multiplied by d. such that the product equals pounds OC emissions per month); and
 - f. whether or not each coating employed is a photochemically reactive material.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

2. The permit to install for this emissions unit (P002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: heptane

TLV (mg/m³): 1,639,264

Maximum Hourly Emission Rate (lbs/hr): 3.7

Emissions Unit ID: P002

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 192
MAGLC (ug/m3): 39,030

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the

D. Reporting Requirements

1. The permittee shall submit a deviation report which identifies any coating and/or cleanup material which meets the definition of "photochemically reactive material" as defined in OAC rule 3745-21-01(C)(5) and the quantity of such materials employed. The notification shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specifies the total organic compound emissions from this emissions unit from the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the organic compounds (OC) emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Limitations

Organic compound (OC) emissions shall not exceed 3.7 pounds per hour and 16.21 tons per year

Applicable Compliance Method

Compliance with the pounds per hour and tons per year OC emissions limitations in section A.1. shall be demonstrated by calculations using the permittee-provided production data contained in PTI application 14-05818, as submitted on February 16, 2006.

The Applicable Emissions Limitations/Control Measures in Part A.1 were developed as follows:

$$\text{OC Emissions (lbs/hr)} = [(\text{tires/hr}) \times (\text{lbs dissolution/tire}) \times \{\text{OC Content, weight \%, (lb OC/lb dissolution)}\}]$$

$$\text{OC Emissions (TPY)} = [\{\text{OC Emissions (lbs/hr)}\} \times (8760 \text{ hrs/Year}) \times (\text{Ton}/2000 \text{ lbs})]$$

F. Miscellaneous Requirements

None

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Emissions Unit ID: **P002**