



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

12/22/2015

Amber Trost
Hyload, Inc.
5020 Panther Parkway
Seville, OH 44273

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652100087
Permit Number: P0118781
Permit Type: Administrative Modification
County: Medina

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



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Hyload, Inc.**

Facility ID:	1652100087
Permit Number:	P0118781
Permit Type:	Administrative Modification
Issued:	12/22/2015
Effective:	12/22/2015
Expiration:	12/21/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Hyload, Inc.

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. K001, Asphalt Adhesive Application.....	11
2. P001, Adhesive Mix Tank, Adhesive Holding Tank	16
3. P901, Rubber Compounding Mills, Calendars, Banbury.....	20



Final Permit-to-Install and Operate
Hyload, Inc.
Permit Number: P0118781
Facility ID: 1652100087
Effective Date: 12/22/2015

Authorization

Facility ID: 1652100087
Application Number(s): M0003345, M0003346
Permit Number: P0118781
Permit Description: Agency-Initiated Administrative Modification to correct emissions units K001 and P001 BAT limits with updated emission factors/production rates, add OAC 3745-21-28 record keeping requirements, remove obsolete OAC 3745-21-07 terms, and change visible emission check frequency from daily to weekly.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 12/22/2015
Effective Date: 12/22/2015
Expiration Date: 12/21/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Hyload, Inc.
9976 RITTMAN ROAD
Wadsworth, OH 44281

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118781

Permit Description: Agency-Initiated Administrative Modification to correct emissions units K001 and P001 BAT limits with updated emission factors/production rates, add OAC 3745-21-28 record keeping requirements, remove obsolete OAC 3745-21-07 terms, and change visible emission check frequency from daily to weekly.

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

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K001

Asphalt Adhesive Application
P0112132
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

P001

Adhesive Mix Tank, Adhesive Holding Tank
P0112132
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

P901

Rubber Compounding Mills, Calendars, Banbury
P0116603
Not Applicable



Final Permit-to-Install and Operate
Hyload, Inc.
Permit Number: P0118781
Facility ID: 1652100087
Effective Date: 12/22/2015

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
Hyload, Inc.
Permit Number: P0118781
Facility ID: 1652100087
Effective Date: 12/22/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Hyload, Inc.

Permit Number: P0118781

Facility ID: 1652100087

Effective Date: 12/22/2015

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
Hyload, Inc.
Permit Number: P0118781
Facility ID: 1652100087
Effective Date: 12/22/2015

C. Emissions Unit Terms and Conditions

1. K001, Asphalt Adhesive Application

Operations, Property and/or Equipment Description:

Asphalt adhesive at 300°F is poured between two roofing membranes. Not all rolls produced in emissions unit P901 are used in this process. Emissions are uncontrolled.

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)	Particulate emissions (PE) shall not exceed 8.84 pounds per hour (lbs/hr). Volatile organic compound (VOC) emissions shall not exceed 1.25 lbs/hr. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C)	See b)(2)c. below.
d.	OAC rule 3745-21-28(H)	See b)(2)d. and d)(2) below.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) include compliance with the requirements of OAC rule 3745-17-07.
- b. The PE and VOC emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) are based on the potential to emit for this emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials processed, change in the method of operation, or any other change to this emissions unit that results in an increase in the allowable emissions, or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

- c. Pursuant to OAC rule 3745-17-11(C)(3), any surface coating process with a permit-to-install (PTI) issued after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology, best available control technology, or the lowest achievable emission rate shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of this rule. [PTI 16-1403, issued 11/02/1994]
- d. The total actual VOC emissions from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities) at this facility are less than 3.0 tons per rolling, 12-month period. Therefore, the requirements of paragraphs (B) to (G) of OAC rule 3745-21-28 shall not apply.
- e. All PE is assumed to be PM₁₀.

c) Operational Restrictions

- (1) None.

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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall select one of the following methods and maintain the following records for a period of five years:

- a. Monthly recordkeeping method.

- i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;
- ii. VOC content (percent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;
- iii. The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month; and
- iv. The rolling, 12-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling, 12-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.

- b. Daily emissions method.

Provided total VOC emissions are less than 15.0 pounds per day, the permittee may elect to maintain the following records in lieu of the monthly records required per d)(2)a. above:

- i. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day;

- ii. VOC content (percent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per day; and
- iii. The total daily VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per day.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate Ohio EPA District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the appropriate Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information concerning operation of this emissions unit during the 12-month reporting period in the annual PER:
 - a. all weeks during which any visible particulate emissions were observed from any stack serving this emissions unit;
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions; and
 - c. any exceedance of the facility-wide 3.0 tons of total actual VOC emissions per rolling, 12-month period from all miscellaneous industrial adhesive and sealant application processes (including emissions from surface preparation and cleanup activities).

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 8.84 lbs/hr.

Applicable Compliance Methods:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the maximum roofing production rate of 737 lbs/hr by a conversion factor of 1 ton/2000 lbs and the particulate emission factor of 24 lbs/ton (AP-42 Table 11.2-2, dated 1/95).



If required, compliance with the allowable PE limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

VOC emissions shall not exceed 1.25 lbs/hr.

Applicable Compliance Methods:

Compliance with the hourly allowable VOC emission limitation identified above shall be demonstrated by multiplying the maximum roofing production rate of 737 lbs/hr by a conversion factor of 1 ton/2000 lbs and the total organic compounds emission factor of 3.4 lbs/ton (AP-42 Table 11.2-4, dated 1/95).

If required, compliance with the allowable VOC limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.

2. P001, Adhesive Mix Tank, Adhesive Holding Tank

Operations, Property and/or Equipment Description:

Asphalt adhesive mixing. Raw ingredients (rubber, asphalt, mineral oil, tacifiers and whitener) are mixed in a process tank, then the finished asphalt adhesive is transferred to a holding tank. Particulate emissions are controlled by a fiberglass filter.

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)	Particulate emissions (PE) shall not exceed 7.08 pounds per hour (lbs/hr). Volatile organic compound (VOC) emissions shall not exceed 1.44 lbs/hr. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(B)(1) [Medina Co. is an area identified in Appendix A of OAC rule 3745-17-08]	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.
c.	OAC rule 3745-17-08(B)(3) [Medina Co. is an area identified in Appendix A of OAC rule 3745-17-08]	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)	See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-08.
- b. The PE and VOC emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) are based on the potential to emit for this emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials processed, change in the method of operation, or any other change to this emissions unit that results in an increase in the allowable emissions, or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

- c. The permittee shall employ hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit, and minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- d. Pursuant to OAC rule 3745-17-11(A)(1)(f), this rule does not apply to the generation of fugitive dust which the director has determined is subject to rule 3745-17-08 of the Administrative Code.
- e. All PE is assumed to be PM₁₀.

c) Operational Restrictions

- (1) None.

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 emissions of fugitive dust from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and

- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate Ohio EPA District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the appropriate Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information concerning operation of this emissions unit during the 12-month reporting period in the annual PER:
 - a. all weeks during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and
 - b. any corrective actions taken to minimize or eliminate the visible stack and/or fugitive particulate emissions.

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 7.08 lbs/hr.

Applicable Compliance Methods:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by multiplying the emissions unit's maximum production rate of 737 lbs/hr by a conversion factor of 1 ton/2000 lbs and the particulate emission factor of 24 lbs/ton (AP-42 Table 11.2-2, dated 1/95) and the filter control efficiency (1.0 - 0.20).



If required, compliance with the allowable PE limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

VOC emissions shall not exceed 1.44 lbs/hr.

Applicable Compliance Methods:

Compliance with the hourly allowable VOC emission limitation identified above shall be demonstrated by adding the emissions from adhesive mixing and adhesive holding:

$$E = M + H = 0.19 \text{ lb VOC/hr} + 1.25 \text{ lbs VOC/hr} = 1.44 \text{ lbs VOC/hr}$$

Where:

E = VOC emissions rate, in pounds per hour.

M = Adhesive mix tank (mass balance). The emissions unit's maximum annual production rate of 1980 gallons/yr multiplied by 5 gallons lost/55 gallons produced and average density of 9.0 lbs/gallon and a conversion factor of 1 yr/8760 hrs = 0.19 lb VOC per hour.

H = Adhesive holding tank (emission factor). The maximum hourly roofing production rate of 737 lbs/hr multiplied by a conversion factor of 1 ton/2000 lbs and the total organic compounds emission factor of 3.4 lbs/ton (AP-42 Table 11.2-4, dated 1/95) = 1.25 lbs VOC/hr.

If required, compliance with the allowable VOC limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive dust opacity limit identified above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.

3. P901, Rubber Compounding Mills, Calendars, Banbury

Operations, Property and/or Equipment Description:

Uncoated ketone ethylene ester polymer rolls manufactured by rubber compounding equipment (2 mills, 2 calenders, 1 banbury). Particulate emissions are controlled by one or more baghouses.

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)b.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Particulate emissions (PE) shall not exceed 0.83 ton per month averaged over a 12-month rolling period. Volatile organic compound (VOC) emissions shall not exceed 0.55 ton per month averaged over a 12-month rolling period. See b)(2)a. through b)(2)c. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)d. below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1) [Medina Co. is an area identified in Appendix A of OAC rule 3745-17-08]	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.
e.	OAC rule 3745-17-08(B)(3) [Medina Co. is an area identified in Appendix A of OAC rule 3745-17-08]	See b)(2)e. below.
f.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.02 pounds per hour (lbs/hr). See b)(2)f. and b)(2)g. below.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-08.
- b. The PE and VOC emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials processed, change in the method of operation, or any other change to this emissions unit that results in an increase in the allowable emissions, or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

- c. This emissions limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- d. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE or VOC emissions from this air contaminant source since the potential to emit of each pollutant is less than 10 tons per year.

- e. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from these emissions units shall meet the following requirements:

- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate Ohio EPA District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the appropriate Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information concerning operation of this emissions unit during the 12-month reporting period in the annual PER:
 - a. each day the emissions from emissions unit P901 were not vented to the baghouse(s) serving this emissions unit;
 - b. each day the baghouse(s) serving emissions unit P901 was/were not in service when the emissions unit was in operation;
 - c. all weeks during which any visible particulate emissions were observed from any stack serving this emissions unit;
 - d. all weeks during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and
 - e. any corrective actions taken to minimize or eliminate the visible stack and/or fugitive particulate emissions.

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:

PE shall not exceed 0.83 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly allowable PE limit identified above shall be demonstrated by multiplying the emissions unit's maximum hourly production rate of 1,944 lbs/hr by the particulate emission factor of 3.58×10^{-04} lb/lb rubber (AP-42, Section 4.12, Mixing Emission Factor Table, Compound #10, dated 11/08), then by a particulate source factor of 3 (banbury, compounding and coal tar pitch areas) and conversion factors of 1 ton/2000 lbs, 8760 hrs/yr and 1 yr/12 months.

If required, compliance with the allowable PE limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 0.55 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly allowable VOC limit identified above shall be demonstrated by multiplying the emissions unit's maximum hourly production rate of 1,944 lbs/hr by the VOC emission factor of 2.91×10^{-04} lb/lb rubber (AP-42, Section 4.12, Mixing Emission Factor Table, Compound #10, dated 11/08), then by a VOC source factor of 2 (banbury and dump mill) and conversion factors of 1 ton/2000 lbs, 8760 hrs/yr and 1 yr/12 months.

If required, compliance with the allowable VOC limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



Applicable Compliance Method:

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

d. Emission Limitation:

Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive dust opacity limit identified above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

e. Emission Limitations:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain PE/dscf of exhaust gases or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Methods:

Compliance with the requirement for no visible PE from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet PE rate, compliance with the 0.030 grain PE/dscf of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

f. Emission Limitation:

PE shall not exceed 4.02 lbs/hr.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limit identified above shall be determined by the results of emissions testing performed in accordance with U.S. EPA Methods 1-5 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10).

g) **Miscellaneous Requirements**

- (1) None.