

Synthetic Minor Determination and/or Netting Determination
Permit To Install: 16-02519

A. Source Description

Trelleborg Sealing Profiles NA manufactures extruded silicone or synthetic sealing materials. The facility consists of 6 existing extrusion lines (emissions unit P001-P005 and P008) and will be installing 2 new extrusion lines (emissions units P006 and P007).

B. Facility Emissions and Attainment Status

The facility has a potential to emit of 20.05 tons per year of an individual hazardous air pollutant (HAP) and over 31.1 tons per year of total combined HAPs. The facility's potential to emit for volatile organic compounds, nitrogen oxides, particulate emissions, and carbon monoxide are under the Title V thresholds. Portage County is nonattainment for ozone.

C. Source Emissions

The facility has requested to limit the production of EPDM to 30,000,000 pounds per year. This restriction will limit the individual HAP and total combined to below the Title V thresholds. The entire facility will be limited to 9.88 tons per year of any individual HAP and 24.0 tons per year of total combined HAPs. The organic compounds emissions, particulate emissions, carbon monoxide emissions, and nitrogen oxide emissions for emissions unit P001 through P008 will be limited to 61.68 tons per year, 9.87 tons per year, 2.43 tons per year, and 5.52 tons per year, respectively.

D. Conclusion

With the production limitations on EPDM for emissions units P001 through P006, Trelleborg's potential to emit for any individual HAP and total combined HAPs will be below the Title V thresholds. To ensure compliance, Trelleborg will maintain monthly records of the EPDM production, the individual HAP emissions, and the total combined HAPs emissions. Trelleborg will also submit quarterly and annual reports. With the restriction on EPDM production, Trelleborg will avoid Title V permitting requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
PORTAGE COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 16-02519

Fac ID: 1667080043

DATE: 5/22/2008

Trelleborg Sealing Profiles NA
Eugene Gormley
1780 Miller Pkwy
Streetsboro, OH 44241

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$4300** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

ARAQMD

AKRON METRO AREA TRANS STUDY

WV

PA

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02519 FOR AN AIR CONTAMINANT SOURCE
FOR Trelleborg Sealing Profiles NA**

On 5/22/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Trelleborg Sealing Profiles NA**, located at **1780 Miller Pkwy, Streetsboro, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02519:

Six Existing Rubber/Silicone Extrusion Units, Two New Silicone Extrusion Units.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 16-02519

Application Number: 16-02519
Facility ID: 1667080043
Permit Fee: **To be entered upon final issuance**
Name of Facility: Trelleborg Sealing Profiles NA
Person to Contact: Eugene Gormley
Address: 1780 Miller Pkwy
Streetsboro, OH 44241

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1780 Miller Pkwy
Streetsboro, Ohio**

Description of proposed emissions unit(s):

Six Existing Rubber/Silicone Extrusion Units, Two New Silicone Extrusion Units.

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

Chris Korleski
Director

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 (i.e., postmarked) quarterly 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 the premises of this source at any reasonable time for purposes of making inspections,

Trelleborg Sealing Profiles NA

PTI Application: 16-02519

Issued: To be entered upon final issuance

Facility ID: 1667080043

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)

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

Trelleborg Sealing Profiles NA

Facility ID: 1667080043

PTI Application: 16-02519

Issued: To be entered upon final issuance

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

Trelleborg Sealing Profiles NA

Facility ID: 1667080043

PTI Application: 16-02519

Issued: To be entered upon final issuance

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

Trelleborg Sealing Profiles NA

Facility ID: 1667080043

PTI Application: 16-02519

Issued: To be entered upon final issuance

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	9.87
OC	67.73
CO	2.43
NOx	5.52
any individual HAP	9.88
total combined HAPs	24.0

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P001) - EPDM hopper, extruder, salt bath curing line, microwave and infrared heating units - Extrusion Line 1.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 2.43 pounds per hour and 10.64 tons per year.</p> <p>See A.2.b below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	<p>The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.34 pound per hour and 1.49 tons per year.</p>

Emissions Unit ID: **P001**

OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

B. Operational Restrictions

- 1. The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

Issued: To be entered upon final issuance

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

Note: The silicone production rate is not limited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
 - d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot

Emissions Unit ID: P001

air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days

Issued: To be entered upon final issuance

per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions

Emissions Unit ID: **P001**

units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. The permittee shall collect, record, and retain the following information for each toxic

Issued: To be entered upon final issuance

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 units or the materials applied.
6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month EPDM production rate limitation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative EPDM production rate levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility).

Emissions Unit ID: P001

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility, the total combined HAPs emissions for the entire facility, and the total EPDM production rate for P001 through P006, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

The emissions of OC shall not exceed 2.43 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

Issued: To be entered upon final issuance

b. Emission Limitation:

The emissions of OC shall not exceed 10.64 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.34 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

Emissions Unit ID: P001

e. Emission Limitation:

The PE/PM10 shall not exceed 1.49 tons per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

F. Miscellaneous Requirements

- The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.2, D.4, and E.1.
- Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415

Emissions Unit ID: **P001**

Issued: To be entered upon final issuance

RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P002) - EPDM hopper, extruder, salt bath curing line, infrared heating units - Extrusion Line 2.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 1.46 pounds per hour and 6.39 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.20 pound per hour and 0.88 ton per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
---------------------	--

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

B. Operational Restrictions

1. The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with

Emissions Unit ID: **P002**

the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
 - d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

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

Issued: To be entered upon final issuance

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable

Emissions Unit ID: P002

Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall

Issued: To be entered upon final issuance

not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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):

Emissions Unit ID: P002

- 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 units or the materials applied.
6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month EPDM production rate limitation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative EPDM production rate levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

Issued: To be entered upon final issuance

3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility, the total combined HAPs emissions for the entire facility, and the total EPDM production rate for P001 through P006, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 1.46 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

Emissions Unit ID: **P002**

The emissions of OC shall not exceed 6.39 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

The PE/PM10 shall not exceed 0.88 ton per year.

Issued: To be entered upon final issuanceApplicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.2, D.4, and E.1.
2. Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

Trelleborg Sealing Profiles NA
DTI Application: 16-02510

Facility ID: 1667080043

Emissions Unit ID: **P002**

All the above-mentioned stacks shall be unobstructed and vertical.

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P003) - EPDM hopper, extruder, natural gas fired curing line, microwave heating unit - Extrusion Line 3.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 1.46 pounds per hour and 6.39 tons per year.</p> <p>Natural gas combustion emissions from the curing oven shall not exceed the following:</p> <p>0.10 pound of carbon monoxide (CO) per hour and 0.44 ton of CO per year;</p> <p>0.22 pound of nitrogen oxides (NO_x) per hour and 1.0 ton of NO_x per year;</p> <p>0.013 pound of OC per hour and 0.06 ton of OC per year; and</p> <p>0.01 pound of PE/PM₁₀ per hour and 0.04 ton of PE/PM₁₀ per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>

Issued: To be entered upon final issuance

OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.20 pound per hour and 0.88 ton per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 emission limitations, hourly and annual OC emission limitations, and the hourly and annual natural gas combustion emissions limitations for CO, NO_x, OC, and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

B. Operational Restrictions

1. The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

Issued: To be entered upon final issuance

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

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

Note: The silicone production rate is not limited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:

Emissions Unit ID: P003

- a. the production rate for each product for each month, in pounds;
- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

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

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented

Issued: To be entered upon final issuance

from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

Emissions Unit ID: P003

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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

Issued: To be entered upon final issuance

- c. physical changes to the emissions units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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 units or the materials applied.

Emissions Unit ID: P003

6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month EPDM production rate limitation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative EPDM production rate levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility, the total combined HAPs emissions for the entire facility, and the total EPDM production rate for P001 through P006, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Issued: To be entered upon final issuance

Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

a. Emission Limitation:

The emissions of OC shall not exceed 1.46 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 6.39 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons

Trelleborg Sealing Profiles NA
DTI Application: 16-02510

Facility ID: 1667080043

Emissions Unit ID: **P003**

per year, based upon a rolling, 12-month summation of the monthly emissions.

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.88 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g. Emission Limitation:

Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

Cure Oven - 0.10 pound of CO per hour

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 0.0824 pound of CO emissions per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The CO emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

h. Emission Limitation:

Cure Oven - 0.22 pound of NO_x

Applicable Compliance Method:

Compliance with the hourly allowable NO_x emission limitation above shall be demonstrated by multiplying the NO_x emission factor of 0.186 pound of NO_x emissions per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The NO_x emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The NO_x emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

i. Emission Limitation:

Cure Oven - 0.013 pound of OC per hour

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0108 pound of OC emissions per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The OC emission factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The OC emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

j. Emission Limitation:

Cure Oven - 0.01 pound of PE/PM10 per hour

Issued: To be entered upon final issuanceApplicable Compliance Method:

Compliance with the hourly allowable PE/PM10 limitation above shall be demonstrated by multiplying the PE/PM10 factor of 0.0075 pound of PE/PM10 per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The PE/PM10 factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The PE/PM10 emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

k. Emissions Limitations:

Cure Oven - 0.44 ton of CO per year, 1.0 ton of NOx per year, 0.06 ton of OC per year, and 0.04 ton of PE/PM10 per year

Applicable Compliance Method:

The annual allowable emissions limitations above were determined by multiplying each hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emissions limitations are maintained, compliance with the annual allowable emissions limitations shall be assumed.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.2, D.4, and E.1.
2. Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415

Issued: To be entered upon final issuance

RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- 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.

Operations, Property, and/or Equipment - (P004) - EPDM hopper, extruder, natural gas fired curing line, microwave heating unit - Extrusion Line 4.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 1.46 pounds per hour and 6.39 tons per year.</p> <p>Natural gas combustion emissions from the curing oven shall not exceed the following:</p> <p>0.124 pound of carbon monoxide (CO) per hour and 0.54 ton of CO per year;</p> <p>0.28 pound of nitrogen oxides (NOx) per hour and 1.23 tons of NOx per year;</p> <p>0.02 pound of OC per hour and 0.09 ton of OC per year; and</p> <p>0.011 pound of PE/PM10 per hour and 0.05 ton of PE/PM10 per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>

Issued: To be entered upon final issuance

OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.20 pound per hour and 0.88 ton per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 emission limitations, hourly and annual OC emission limitations, and the hourly and annual natural gas combustion emissions limitations for CO, NO_x, OC, and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

B. Operational Restrictions

1. The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

Emissions Unit ID: **P004**

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

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

Note: The silicone production rate is not limited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:

Issued: To be entered upon final issuance

- a. the production rate for each product for each month, in pounds;
- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

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

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented

Emissions Unit ID: P004

from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

Issued: To be entered upon final issuance

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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

Emissions Unit ID: P004

- c. physical changes to the emissions units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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 units or the materials applied.

Emissions Unit ID: P004

6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month EPDM production rate limitation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative EPDM production rate levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility, the total combined HAPs emissions for the entire facility, and the total EPDM production rate for P001 through P006, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Trelleborg Sealing Profiles NA
DTI Application: 16-02510

Facility ID: 1667080043

Emissions Unit ID: P004

Issued: To be entered upon final issuance

a. Emission Limitation:

The emissions of OC shall not exceed 1.46 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 6.39 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

per year, based upon a rolling, 12-month summation of the monthly emissions.

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.88 ton per year.

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g. Emission Limitation:

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

Cure Oven - 0.124 pound of CO per hour

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 0.0824 pound of CO emissions per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The CO emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

h. Emission Limitation:

Cure Oven - 0.28 pound of NO_x

Applicable Compliance Method:

Compliance with the hourly allowable NO_x emission limitation above shall be demonstrated by multiplying the NO_x emission factor of 0.186 pound of NO_x emissions per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The NO_x emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The NO_x emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

i. Emission Limitation:

Cure Oven - 0.02 pound of OC per hour

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0108 pound of OC emissions per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The OC emission factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The OC emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

j. Emission Limitation:

Cure Oven - 0.011 pound of PE/PM10 per hour

Issued: To be entered upon final issuanceApplicable Compliance Method:

Compliance with the hourly allowable PE/PM10 limitation above shall be demonstrated by multiplying the PE/PM10 factor of 0.0075 pound of PE/PM10 per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The PE/PM10 factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The PE/PM10 emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

k. Emissions Limitations:

Cure Oven - 0.54 ton of CO per year, 1.23 ton of NOx per year, 0.09 ton of OC per year, and 0.05 ton of PE/PM10 per year

Applicable Compliance Method:

The annual allowable emissions limitations above were determined by multiplying each hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emissions limitations are maintained, compliance with the annual allowable emissions limitations shall be assumed.

F. Miscellaneous Requirements

- The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.2, D.4, and E.1.
- Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P005) - EPDM hopper, extruder, natural gas fired curing line, microwave heating unit - Extrusion Line 5.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 2.43 pounds per hour and 10.64 tons per year.</p> <p>Natural gas combustion emissions from the curing oven shall not exceed the following:</p> <p>0.33 pound of carbon monoxide (CO) per hour and 1.45 tons of CO per year;</p> <p>0.75 pound of nitrogen oxides (NOx) per hour and 3.29 tons of NOx per year;</p> <p>0.04 pound of OC per hour and 0.18 ton of OC per year; and</p> <p>0.03 pound of PE/PM10 per hour and 0.13 ton of PE/PM10 per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>

Emissions Unit ID: P005

OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.34 pound per hour and 1.49 tons per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 emission limitations, hourly and annual OC emission limitations, and the hourly and annual natural gas combustion emissions limitations for CO, NO_x, OC, and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

B. Operational Restrictions

1. The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of

Emissions Unit ID: P005

this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

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

Note: The silicone production rate is not limited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:

Issued: To be entered upon final issuance

- a. the production rate for each product for each month, in pounds;
- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

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

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (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

Emissions Unit ID: P005

was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 72.8

MAGLC (ug/m3): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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

Emissions Unit ID: **P005**

- c. physical changes to the emissions units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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 units or the materials applied.

Issued: To be entered upon final issuance

6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month EPDM production rate limitation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative EPDM production rate levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility, the total combined HAPs emissions for the entire facility, and the total EPDM production rate for P001 through P006, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Unit ID: P005

a. Emission Limitation:

The emissions of OC shall not exceed 2.43 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 10.64 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons

Issued: To be entered upon final issuance

per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.34 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 1.49 tons per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

Emissions Unit ID: **P005**

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g. Emission Limitation:

Cure Oven - 0.33 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 0.0824 pound of CO emissions per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The CO emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

h. Emission Limitation:

Cure Oven - 0.75 pound of NO_x

Applicable Compliance Method:

Compliance with the hourly allowable NO_x emission limitation above shall be demonstrated by multiplying the NO_x emission factor of 0.186 pound of NO_x emissions per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The NO_x emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The NO_x emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

i. Emission Limitation:

Cure Oven - 0.04 pound of OC per hour

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0108 pound of OC emissions per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The OC emission factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The OC emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

j. Emission Limitation:

Cure Oven - 0.03 pound of PE/PM10 per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE/PM10 limitation above shall be demonstrated by multiplying the PE/PM10 factor of 0.0075 pound of PE/PM10 per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The PE/PM10 factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The PE/PM10 emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

k. Emissions Limitations:

Cure Oven - 1.45 tons of CO per year, 3.29 tons of NOx per year, 0.18 ton of OC per year, and 0.13 ton of PE/PM10 per year

Applicable Compliance Method:

The annual allowable emissions limitations above were determined by multiplying each hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emissions limitations are maintained, compliance with the annual allowable emissions limitations shall be assumed.

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.2, D.4, and E.1.
2. Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

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.

Operations, Property, and/or Equipment - (P006) - EPDM hopper, extruder, salt bath curing line, microwave and infrared heating units - Extrusion Line 6.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

Emissions Unit ID: P006

OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 4.28 pounds per hour and 18.75 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.60 pound per hour and 2.63 tons per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

B. Operational Restrictions

1. The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

Issued: To be entered upon final issuance

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

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

Note: The silicone production rate is not limited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information for emissions

Emissions Unit ID: **P006**

units P001, P002, P003, P004, P005, P006, P007, and P008, combined:

- a. the production rate for each product for each month, in pounds;
- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

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

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (as determined from the raw materials

Issued: To be entered upon final issuance

processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

Issued: To be entered upon final issuance

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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

Emissions Unit ID: **P006**

3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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 units or the materials applied.

6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month EPDM production rate limitation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative EPDM production rate levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility, the total combined HAPs emissions for the entire facility, and the total EPDM production rate for P001 through P006, combined, for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Issued: To be entered upon final issuance

a. Emission Limitation:

The emissions of OC shall not exceed 4.28 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 18.75 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install

Emissions Unit ID: **P006**

exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.60 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 2.63 tons per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and

Issued: To be entered upon final issuance

procedures specified in OAC rule 3745-17-07(B)(1).

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.2, D.4, and E.1.
2. Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P007) - Silicone hopper, extruder, salt bath curing line, infrared heating units - Extrusion Line 7.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.16 pound per hour and 0.70 ton per year.
OAC rule 3745-31-05(A)(3)(b)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC, PE, and PM10 emissions from this air contaminant source since the uncontrolled potential to emit for OC, PE, PM10 are each less than ten tons per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
---------------------	--

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 emission limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

B. Operational Restrictions

1. This emissions unit shall only manufacturer silicone products.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
- the production rate for each product for each month, in pounds;
 - the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
 - beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

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

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

Issued: To be entered upon final issuance

2. The permittee shall maintain a daily production log to document what was manufactured in this emissions unit.
3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting

Emissions Unit ID: P007

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

*Combined emission rate from emissions units P001 through P008.

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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:
- 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;
 - 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

Issued: To be entered upon final issuance

- c. physical changes to the emissions units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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 units or the materials applied.

6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a product other than a silicone product is manufactured in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility and the total combined HAPs emissions for the entire facility for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:

Issued: To be entered upon final issuance

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

b. Emission Limitation:

The PE/PM10 shall not exceed 0.16 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

c. Emission Limitation:

The PE/PM10 shall not exceed 0.70 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

d. Emission Limitation:

Emissions Unit ID: P007

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.3, D.4, and E.1.
2. Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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.

Operations, Property, and/or Equipment - (P008) - Silicone hopper, extruder, salt bath curing line, infrared heating units - Extrusion Line 8.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC) shall not exceed 0.93 pound per hour and 4.1 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).</p>
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See B.1 below.</p>
OAC rule 3745-31-05(C) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.16 pound per hour and 0.70 ton per year.
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Issued: To be entered upon final issuance

OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
---------------------	--

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

B. Operational Restrictions

1. This emissions unit shall only manufacturer silicone products.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of (a) times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in (b));
 - d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

Emissions Unit ID: **P008**

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

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

2. The permittee shall maintain a daily production log to document what was manufactured in this emissions unit.
3. The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units 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 emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, 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 emitted from the emissions units, (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

Issued: To be entered upon final issuance

the general public (TLV/10).

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

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

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

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

*Combined emission rate from emissions units P001 through P008.

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, 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).

4. Prior to making any physical changes to or changes in the method of operation of the emissions units, 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

Emissions Unit ID: **P008**

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 units 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", ORC 3704.03(F), 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. 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

Issued: To be entered upon final issuance

- 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 units or the materials applied.
6. 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.88 tons and 24.0 tons, respectively (from the entire facility). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting 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. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a product other than a silicone product is manufactured in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
4. The permittee shall submit annual reports that specify the individual HAP emissions for each HAP for the entire facility and the total combined HAPs emissions for the entire facility for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Emissions Unit ID: P008

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

The emissions of OC shall not exceed 0.93 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.001556 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

- b. Emission Limitation:

The emissions of OC shall not exceed 4.1 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

- c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Issued: To be entered upon final issuance

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in section C.1 of this permit.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.16 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.70 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

Emissions Unit ID: P008

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.1, B.1, C.1, C.2, D.1, D.3, D.4, and E.1.
2. Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with "Toxic Air Contaminant Statute", ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.

Emissions Unit ID: P008

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION EPDM hopper, extruder, salt bath curing line, microwave and infrared heating units - Extrusion Line 1.

DATE INSTALLED 1995

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.0002	0.34 lb/hr	1.49
PM ₁₀			0.0002	0.34 lb/hr	1.49
Sulfur Dioxide					
Organic Compounds			10.6	2.43 lbs/hr	10.64
Nitrogen Oxides					
Carbon Monoxide					
any individual HAP			3.6		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			5.51		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: P008

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P002
 EMISSIONS UNIT DESCRIPTION EPDM hopper, extruder, salt bath curing line, infrared heating units - Extrusion Line 2.
 DATE INSTALLED 1995

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.0001	0.20 lb/hr	0.88
PM ₁₀			0.0001	0.20 lb/hr	0.88
Sulfur Dioxide					
Organic Compounds			6.4	1.46 lbs/hr	6.39
Nitrogen Oxides					
Carbon Monoxide					
any individual HAP			2.16		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			3.3		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: P008

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P003
 EMISSIONS UNIT DESCRIPTION EPDM hopper, extruder, natural gas fired curing line, microwave heating unit - Extrusion Line 3.
 DATE INSTALLED 1995

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.04	0.20 lb/hr 0.01 lb/hr (cure oven)	0.88 0.04 (cure oven)
PM ₁₀			0.04	0.20 lb/hr 0.01 lb/hr (cure oven)	0.88 0.04 (cure oven)
Sulfur Dioxide					
Organic Compounds				1.46 lbs/hr 0.013 lb/hr (cure oven)	6.39 0.06 (cure oven)
Nitrogen Oxides			0.98	0.22 lb/hr (cure oven)	1.0 (cure oven)
Carbon Monoxide			0.43	0.10 lb/hr (cure oven)	0.44 (cure oven)
any individual HAP			2.16		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			3.3		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

Trelleborg Sealing Profiles NA
PTI Application: 16-02519
Issued: To be entered upon final issuance

Facility ID: 1667080043

Emissions Unit ID: P008

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: **P008**

Issued: To be entered upon final issuance

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P004
 EMISSIONS UNIT DESCRIPTION EPDM hopper, extruder, natural gas fired curing line, microwave heating unit - Extrusion Line 4.
 DATE INSTALLED 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.05	0.20 lb/hr 0.011 lb/hr (cure oven)	0.88 0.05 (cure oven)
PM ₁₀			0.05	0.20 lb/hr 0.011 lb/hr (cure oven)	0.88 0.05 (cure oven)
Sulfur Dioxide					
Organic Compounds			6.4	1.46 lb/hr 0.02 lb/hr (cure oven)	6.39 0.09 (cure oven)
Nitrogen Oxides			1.22	0.28 lb/hr (cure oven)	1.23 (cure oven)
Carbon Monoxide			0.54	0.124 lb/hr (cure oven)	0.54 (cure oven)
any individual HAP			2.16		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			3.3		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of this permit.

Issued: To be entered upon final issuance

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: **P008**

Issued: To be entered upon final issuance

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P005
 EMISSIONS UNIT DESCRIPTION EPDM hopper, extruder, natural gas fired curing line, microwave heating unit - Extrusion Line 5.
 DATE INSTALLED 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.04	0.34 lb/hr 0.03 lb/hr (cure oven)	1.49 0.13 (cure oven)
PM ₁₀			0.04	0.34 lb/hr 0.03 lb/hr (cure oven)	1.49 0.13 (cure oven)
Sulfur Dioxide					
Organic Compounds			10.71	2.43 lbs/hr 0.04 lb/hr (cure oven)	10.64 0.18 (cure oven)
Nitrogen Oxides			3.26	0.75 lb/hr (cure oven)	3.29 (cure oven)
Carbon Monoxide			1.44	0.33 lb/hr (cure oven)	1.45 (cure oven)
any individual HAP			3.6		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			5.51		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

Trelleborg Sealing Profiles NA
PTI Application: 16-02519
Issued: To be entered upon final issuance

Facility ID: 1667080043

Emissions Unit ID: P008

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: **P008**

Issued: To be entered upon final issuance

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P006
 EMISSIONS UNIT DESCRIPTION EPDM hopper, extruder, salt bath curing line, microwave and infrared heating units - Extrusion Line 6.
 DATE INSTALLED Not Begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.0003	0.60 lb/hr	2.63
PM ₁₀			0.0003	0.60 lb/hr	2.63
Sulfur Dioxide					
Organic Compounds			18.69	4.28 lbs/hr	18.75
Nitrogen Oxides					
Carbon Monoxide					
any individual HAP			6.34		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			9.69		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: **P008**

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P007
 EMISSIONS UNIT DESCRIPTION Silicone hopper, extruder, salt bath curing line, infrared heating units - Extrusion Line 7.
 DATE INSTALLED Not Begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.00002	0.16 lb/hr	0.70
PM ₁₀			0.00002	0.16 lb/hr	0.70
Sulfur Dioxide					
Organic Compounds			3.4	none <10 tpy	none <10 tpy
Nitrogen Oxides					
Carbon Monoxide					
any individual HAP			0.06		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			0.2		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide

Emissions Unit ID: **P008****Issued: To be entered upon final issuance**

SIC CODE 3053 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P008
 EMISSIONS UNIT DESCRIPTION Silicone hopper, extruder, salt bath curing line, infrared heating units - Extrusion Line 8.
 DATE INSTALLED 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter			0.00002	0.16 lb/hr	0.70
PM ₁₀			0.00002	0.16 lb/hr	0.70
Sulfur Dioxide					
Organic Compounds			4.1	0.93 lb/hr	4.1
Nitrogen Oxides					
Carbon Monoxide					
any individual HAP			0.07		9.88 as a rolling 12-month summation for the entire facility
total combined HAPs			0.24		24.0 as a rolling 12-month summation for the entire facility

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: acetophenone and carbon disulfide