



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 16-02018**

**DATE: 3/22/00**

Ace Rubber Company  
Charles Garro  
100 Beech St  
Akron, OH 44308

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

ARAQMD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 3/22/00

**FINAL PERMIT TO INSTALL 16-02018**

Application Number: 16-02018  
APS Premise Number: 1677010332  
Permit Fee: **\$300**  
Name of Facility: Ace Rubber Company  
Person to Contact: Charles Garro  
Address: 100 Beech St  
Akron, OH 44308

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

**100 Beech St  
Akron, Ohio**

Description of proposed emissions unit(s):

**Diesel powered electrical generating units - three (3) engine/generator sets.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

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

**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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

**Ace Rubber Company**  
**PTI Application: 16-02018**  
**Issued: 3/22/00**

**Facility ID: 1677010332**

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>
NOx	24.96
CO	5.4
VOC	2.04
SO2	1.63
PE	1.74

**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.

OAC rule 3745-18-06(B)

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

B001 - 20 kW oil-fired generator

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)

OAC rule 3745-17-11(B)(5)(a)

Applicable Emissions  
Limitations/Control Measures

0.73 lb of nitrogen oxides (NO<sub>x</sub>)/hr  
3.20 tons of NO<sub>x</sub> /year

0.16 lb of carbon monoxide  
(CO)/hr  
0.7 ton of CO/year

0.06 lb of volatile organic  
compounds (VOC)/hr  
0.3 ton of VOC/year

0.05 lb of sulfur dioxide (SO<sub>2</sub>)/hr  
0.2 ton of SO<sub>2</sub>/year

0.05 lb of particulate emissions  
(PE)/hr  
0.2 ton of PE/year

Visible particulate emissions from  
any stack shall not exceed 10  
percent opacity as a six-minute  
average.

See A.2.a below.

The particulate emissions from the  
engine's exhaust shall not exceed  
0.310 pound per million Btu of  
actual heat input.

See A.2.b below.

## 2. Additional Terms and Conditions

- 2.a** The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.
- 2.b** This emissions unit is exempt from OAC rule 3745-18-06(G) because the stationary internal combustion engine has a rated heat input capacity less than 10 MM Btu per hour total rated capacity.

## B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emissions unit.

## C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## E. Testing Requirements

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

a. Emission Limitation:

0.73 lb of NO<sub>x</sub>/hr  
3.20 tons of NO<sub>x</sub> /year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 4.41 pounds of NO<sub>x</sub>/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual

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**Ace R**

**PTI A**

**Issued: 3/22/00**

Emissions Unit ID: **B001**

emission limitation shall be determined by multiplying the hourly emission rate by 8760 hrs/yr and then divided by 2000 lbs/ton.

b. Emission Limitation:

0.16 lb of CO/hr  
0.7 ton of CO/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.95 pound of CO/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hrs/yr and then divided by 2000 lbs/ton.

c. Emission Limitation:

0.06 lb of VOC/hr  
0.3 ton of VOC/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.36 pound of VOC/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hrs/yr and then divided by 2000 lbs/ton.

d. Emission Limitation:

0.05 lb of SO<sub>2</sub>/hr  
0.2 ton of SO<sub>2</sub>/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.29 pound of SO<sub>2</sub>/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760

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Emissions Unit ID: **B001**

hrs/yr and then divided by 2000 lbs/ton.

e. Emission Limitation:

0.05 lb of PE/hr  
0.2 ton of PE/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.31 pound of PE/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hrs/yr and then divided by 2000 lbs/ton.

f. Emission Limitation:

The particulate emissions from the engine's exhaust shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with OAC rule 3745-17-03(B)(10) and Method 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

**F. Miscellaneous Requirements**

None

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
B002 - 60 kW oil-fired generator	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)(a)
		OAC rule 3745-18-06(B)
	OAC rule 3745-17-07(A)	

**Ace R**  
**PTI A**  
**Issued: 3/22/00**

Emissions Unit ID: **B002**

Applicable Emissions  
Limitations/Control Measures

1.71 lbs of nitrogen oxides  
(NO<sub>x</sub>)/hr  
0.54 ton of NO<sub>x</sub> /year

0.37 lb of carbon monoxide  
(CO)/hr  
0.1 ton of CO/year

0.14 lb of volatile organic  
compounds (VOC)/hr  
0.04 ton of VOC/year

0.11 lb of sulfur dioxide (SO<sub>2</sub>)/hr  
0.03 ton of SO<sub>2</sub>/year

0.12 lb of particulate emissions  
(PE)/hr  
0.04 ton of PE/year

Visible particulate emissions from  
any stack shall not exceed 10  
percent opacity as a six-minute  
average.

The operational restriction on  
operating hours is to avoid Ohio  
Modeling requirements for nitrogen  
dioxide. (See B.2 below.)

See A.2.a below.

The particulate emissions from the  
engine's exhaust shall not exceed  
0.310 pound per million Btu of  
actual heat input.

See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a** The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.
- 2.b** This emissions unit is exempt from OAC rule 3745-18-06(G) because the stationary internal combustion engine has a rated heat input capacity less than 10 MM Btu per hour total rated capacity.

**B. Operational Restrictions**

1. The permittee shall burn only number two fuel oil in this emissions unit.
2. The maximum annual operating hours for this emissions unit shall not exceed 630.

**C. Monitoring and/or Recordkeeping Requirements**

1. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the operating hours for this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

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

a. Emission Limitation:

1.71 lbs of NO<sub>x</sub>/hr  
0.54 ton of NO<sub>x</sub> /year

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be demonstrated by multiply the emission factor of 4.41 pounds of NO<sub>x</sub>/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 630 hrs/yr and then divided by 2000 lbs/ton.

b. Emission Limitation:

0.37 lb of CO/hr  
0.1 ton of CO/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.95 pound of CO/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 630 hrs/yr and then divided by 2000 lbs/ton.

c. Emission Limitation:

0.14 lb of VOC/hr  
0.04 ton of VOC/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.36 pound of VOC/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 630 hrs/yr and then divided by 2000 lbs/ton.

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**Ace R**

**PTI A**

**Issued: 3/22/00**

Emissions Unit ID: **B002**

d. Emission Limitation:

0.11 lb of SO<sub>2</sub>/hr  
0.03 ton of SO<sub>2</sub>/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.29 pound of SO<sub>2</sub>/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 630 hrs/yr and then divided by 2000 lbs/ton.

e. Emission Limitation:

0.12 lb of PE/hr  
0.04 ton of PE/year

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiply the emission factor of 0.31 pound of PE/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 630 hrs/yr and then divided by 2000 lbs/ton.

f. Emission Limitation:

The particulate emissions from the engine's exhaust shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with OAC rule 3745-17-03(B)(10) and Method 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

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**Ace R**

**PTI A**

**Issued: 3/22/00**

Emissions Unit ID: **B002**

Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.

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**Ace R**

**PTI A**

**Issued: 3/22/00**

Emissions Unit ID: **B002**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

**F. Miscellaneous Requirements**

None

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
B003 - 400 kW oil-fired generator	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)(a)
		OAC rule 3745-18-06(B)

**Ace Rubber Company**  
**PTI Application: 16-03018**  
**Issued**

**Facility ID: 1677010332**

**Emissions Unit ID: B003**

Applicable Emissions  
Limitations/Control Measures

16.32 lbs of nitrogen oxides  
(NO<sub>x</sub>)/hr  
21.22 tons of NO<sub>x</sub> /year

3.52 lbs of carbon monoxide  
(CO)/hr  
4.6 tons of CO/year

1.33 lbs of volatile organic  
compounds (VOC)/hr  
1.7 tons of VOC/year

1.07 lbs of sulfur dioxide (SO<sub>2</sub>)/hr  
1.4 tons of SO<sub>2</sub>/year

1.15 lbs of particulate emissions  
(PE)/hr  
1.5 tons of PE/year

Visible particulate emissions from  
any stack shall not exceed 10  
percent opacity as a six-minute  
average.

The operational restriction on  
operating hours is to avoid Ohio  
Modeling requirements for nitrogen  
dioxide. (See B.2 below.)

See A.2.a below.

The particulate emissions from the  
engine's exhaust shall not exceed  
0.310 pound per million Btu of  
actual heat input.

See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a** The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.
- 2.b** This emissions unit is exempt from OAC rule 3745-18-06(G) because the stationary internal combustion engine has a rated heat input capacity less than 10 MM Btu per hour total rated capacity.

**B. Operational Restrictions**

1. The permittee shall burn only number two fuel oil in this emissions unit.
2. The maximum annual operating hours for this emissions unit shall not exceed 2600.

**C. Monitoring and/or Recordkeeping Requirements**

1. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the operating hours for this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

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

- a. Emission Limitation:
- 16.32 lbs of NO<sub>x</sub>/hr  
21.22 tons of NO<sub>x</sub> /year

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be demonstrated by multiply the emission factor of 4.41 pounds of NO<sub>x</sub>/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2600 hrs/yr and then divided by 2000 lbs/ton.

- b. Emission Limitation:
- 3.52 lbs of CO/hr  
4.6 tons of CO/year

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be demonstrated by multiply the emission factor of 0.95 pound of CO/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2600 hrs/yr and then divided by 2000 lbs/ton.

- c. Emission Limitation:
- 1.33 lbs of VOC/hr  
1.7 tons of VOC/year

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be demonstrated by multiply the emission factor of 0.36 pound of VOC/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2600

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Emissions Unit ID: **B003**

hrs/yr and then divided by 2000 lbs/ton.

d. Emission Limitation:

1.07 lbs of SO<sub>2</sub>/hr  
1.4 tons of SO<sub>2</sub>/year

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be demonstrated by multiply the emission factor of 0.29 pound of SO<sub>2</sub>/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2600 hrs/yr and then divided by 2000 lbs/ton.

e. Emission Limitation:

1.15 lbs of PE/hr  
1.5 tons of PE/year

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be demonstrated by multiply the emission factor of 0.31 pound of PE/MM Btu (AP-42 Table 3.3-1) by the maximum hourly Btu rating. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2600 hrs/yr and then divided by 2000 lbs/ton.

f. Emission Limitation:

The particulate emissions from the engine's exhaust shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with OAC rule 3745-17-03(B)(10) and Method 5 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

28

**Ace R**

**PTI A**

**Issued: 3/22/00**

Emissions Unit ID: **B003**

Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.

29

**Ace R**

**PTI A**

**Issued: 3/22/00**

Emissions Unit ID: **B003**

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 16-02018 Facility ID: 1677010332

FACILITY NAME Ace Rubber Company

FACILITY DESCRIPTION Diesel powered electrical generating units - three (3) engine/generator sets. CITY/TWP Akron

SIC CODE 3069 SCC CODE 2-01-001-01 EMISSIONS UNIT ID B001

EMISSIONS UNIT DESCRIPTION 20 kW oil-fired generator

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			0.16	0.05 lb/hr	0.2
PM <sub>10</sub>					
Sulfur Dioxide			0.15	0.05 lb/hr	0.2
Organic Compounds			0.2	0.06 lb/hr	0.3
Nitrogen Oxides			2.3	0.73 lb/hr	3.2
Carbon Monoxide			0.5	0.16 lb/hr	0.7
Lead					
Other: Air Toxics					

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? NO

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\*? YES NO

IDENTIFY THE AIR CONTAMINANTS:



32 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **B003**

FACILITY DESCRIPTION Diesel powered electrical generating units - CITY/TWP Akron  
three (3) engine/generator sets.

SIC CODE 3069 SCC CODE 2-01-001-01 EMISSIONS UNIT ID B003

EMISSIONS UNIT DESCRIPTION 400 kW oil-fired generator

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			1.5	1.15 lbs/hr	1.5
PM <sub>10</sub>					
Sulfur Dioxide			1.4	1.07 lbs/hr	1.4
Organic Compounds			1.7	1.33 lbs/hr	1.7
Nitrogen Oxides			21.22	16.32 lbs/hr	21.22
Carbon Monoxide			4.6	3.52 lbs/hr	4.6
Lead					
Other: Air Toxics					

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? NO  
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\*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 16-02018

Facility ID: 1677010332

FACILITY NAME Ace Rubber Company

<u>FACILITY DESCRIPTION</u>	<u>Diesel powered electrical generating units -</u>	<u>CITY/TWP</u>	<u>Akron</u>
	<u>three (3) engine/generator sets.</u>		

34 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **B001** \_\_\_\_\_

FACILITY DESCRIPTION Diesel powered electrical generating units - CITY/TWP Akron  
three (3) engine/generator sets.

**Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

**Calculations**

**Please provide any additional permit specific notes as you deem necessary:**

**NONE**

**Permit To Install Synthetic Minor Write-Up**

**NONE**

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	24.96
CO	5.4
VOC	2.04
SO2	1.63
PE	1.74