



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

6/28/2016

Certified Mail

Jeremy Lamb  
The Cooper Tire Company - Findlay  
701 Lima Ave.  
Findlay, OH 45840-0550

Facility ID: 0332010003  
Permit Number: P0119900  
County: Hancock

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 4/27/2016. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

Cc: Ohio EPA DAPC, Northwest District Office





## Response to Comments

Facility ID:	0332010003
Facility Name:	The Cooper Tire Company - Findlay
Facility Description:	Tires and Inner Tubes
Facility Address:	701 Lima Ave. Findlay, OH 45840-0550 Hancock County
Permit:	P0119900, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in The Courier on 05/09/2016. The comment period ended on 06/08/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: Rule Applicability**

- a. Comment: Section B, Clause 8: In reference to 40 CFR 63.6004(c)(1), Cooper suggests that "(if applicable)" be inserted as these requirements only apply in the event that the source is complying with the purchasing alternative as described in 40 CFR 63.6004(c).
- b. Response: Ohio EPA agrees and has revised the Title V permit accordingly.

**2. Topic: Suggested Wording**

- a. Comment: Section B, Clause 14.d: To prevent confusion regarding which affected source is being discussed in this item, Cooper suggests replacing the reference to "tread end cement" in this clause to "green tire spray"
- b. Comment: Section C, Clause 1.e.3.c and Clause 2.e.3.c: To prevent confusion Cooper requests the language contained in this clause be reworded to match the language found in 40 CFR 63.7545(f). Therefore, Cooper suggests the following change:



*"if the unit is designed to burn natural gas, refinery gas, or other gas 1 fuels, and there are plans to use fuel other than natural gas, refinery gas, or other gas 1 fuel during a period of natural gas curtailment or supply interruption"*

- c. Response: Ohio EPA agrees and has revised the Title V permit accordingly.

**3. Topic: Emissions Units Omitted**

- a. Comment: Section B, Clause 18: After reviewing the list of emission sources Cooper believes that the two (2) Emergency Fire Pumps (sources P030 and P031) for which it was issued the permit-by-rule approval on 10/25/13 under PBR11043 should be included on this listing.
- b. Response: Ohio EPA agrees and has revised the Title V permit accordingly.

**4. Topic: Clarification**

- a. Comment: Section C, Clause 2.c.3: Cooper mistakenly identified that this source (B006) is subject to Table 3, line #3 in its renewal application. However, as this boiler is equipped with an oxygen trim system it is instead subject to Table 3, line #1. As such, Cooper requests that the frequency of tune-up and inspection of this source be modified to reflect the correct frequency of once every five (5) years.
- b. Response: Ohio EPA agrees and has revised the Title V permit accordingly.

**5. Topic: VOC/OC limit request for emissions unit R012**

- a. Comment: Section C, Clause 13.b: In a permit application associated with PTI P0119867, Cooper modified its Tread Marking Operation (R012) to increase the emissions and to add a third station to the plant. This permit was issued direct to final and therefore did not include a public comment period. While Cooper does not find any errors included in this PTI or the clauses included in this draft Title V permit, it would like to highlight that the emission limitations requested in the application are not reflected in the final PTI and therefore are not in this draft Title V. This contrasts with other significant sources at the plant for which emission limits and operating restrictions apply, thereby reducing the enforceability of these limits. A summary of the typical limitations table for this source is included below that reflect the limits requested in Cooper's most recent application.
- b. Response: PTI P0119867 was issued in accordance with our new BAT approach as a result of Senate Bill 265. Because all the VOC's are HAPs, which are regulated under 40 CFR Part 63 Subpart XXXX, the only BAT for this unit is compliance with the federal rule. If the facility would like to request a modification of this approach, it would need to be done through the new source review process before any changes are incorporated in the Title V permit. Therefore, no changes have been made to the Title V permit based on this comment.



## **PRELIMINARY PROPOSED**

### **Division of Air Pollution Control Title V Permit**

for

The Cooper Tire Company - Findlay

Facility ID:	0332010003
Permit Number:	P0119900
Permit Type:	Renewal
Issued:	6/28/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
The Cooper Tire Company - Findlay

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**Preliminary Proposed Title V Permit**

The Cooper Tire Company - Findlay

**Permit Number:** P0119900

**Facility ID:** 0332010003

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

## Authorization

Facility ID: 0332010003  
Facility Description: Tires and Inner Tubes  
Application Number(s): A0054679  
Permit Number: P0119900  
Permit Description: Renewal Title V permit for The Cooper Tire Company - a manufacturer of tires and inner tubes  
Permit Type: Renewal  
Issue Date: 6/28/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0116001

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

The Cooper Tire Company - Findlay  
701 Lima Ave.  
Findlay, OH 45840-0550

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Preliminary Proposed Title V Permit**  
The Cooper Tire Company - Findlay  
**Permit Number:** P0119900  
**Facility ID:** 0332010003  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- b) 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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



**Preliminary Proposed Title V Permit**

The Cooper Tire Company - Findlay

**Permit Number:** P0119900

**Facility ID:** 0332010003

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

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

#### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



**Preliminary Proposed Title V Permit**

The Cooper Tire Company - Findlay

**Permit Number:** P0119900

**Facility ID:** 0332010003

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

Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
  
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
  
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.



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- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

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 Ohio EPA DAPC, Northwest District Office 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).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



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**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



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## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following rule is applicable to this facility: 40 CFR 63.5980 et seq. (National Emissions Standards for Hazardous Air Pollutants – Rubber Tire Manufacturing, Maximum Achievable Control Technology, MACT, Subpart XXXX)

The permittee shall comply with the applicable emission limitation of 40 CFR 63 Table 1 to Subpart XXXX, for tire production affected sources:

a) Option 1 - HAP constituent option:

(1) Emissions of each HAP (Hazardous Air Pollutant) in Table 16 to Subpart XXXX must not exceed 1,000 grams HAP per megagram (2 pounds per ton) of total cements and solvents used at the tire production affected source, and

(2) Emissions of each HAP not in Table 16 to Subpart XXXX must not exceed 10,000 grams HAP per megagram (20 pounds per ton) of total cements and solvents used at the tire production affected source.

b) Option 2 - production-based option: Emissions of HAP must not exceed 0.024 grams per megagram (0.00005 pounds per ton) of rubber used at the tire production affected source.

3. The following is the list of the emissions units at this facility that are 'tire production affected sources' subject to 40 CFR 63.5980 et seq. (Subpart XXXX):

a) significant emissions units K002, K008, P216, P217, and R012

b) insignificant emissions units K003, K006, K010, K011, and K012

c) all other processes that use or process cements and solvents as defined in 40 CFR 63.6015, including, but not limited to: storage and mixing vessels and the transfer equipment containing cements and/or solvents; wastewater handling and treatment operations; tread end cement operations; tire painting operations; ink and finish operations; undertread cement operations; process equipment cleaning materials; bead cementing operations; tire building operations; green tire spray operations; extruding, to the extent cements and solvents are used; cement house operations; marking operations; calendar operations, to the extent solvents are used; tire striping operations; tire repair operations; slab dip operations; other tire building operations, to the extent that cements and solvents are used; and balance pad operations.

4. The permittee shall use one of the 'alternatives' below, for any given compliance period:

a) Purchase alternative. Use only cements and solvents that, as purchased, contain no more HAP than allowed by the emission limits in B.2.a (i.e. option 1 - HAP constituent option).

b) Monthly average alternative, without using an add-on control device. Use cements and solvents in such a way that the monthly average HAP emissions do not exceed the emission limits in B.2.a or B.2.b (i.e. option 1 or option 2).

[40 CFR 63.5985(a), (b)]



5. The permittee must be in compliance with the applicable emission limitations specified in B.2 at all times.  
[40 CFR 63.5990(a)]
  
6. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart XXXX, including the following sections:  
  
63.6003(a) - monitor and collect data as specified in Table 9 to Subpart XXXX  
  
63.6004(c)(2) - update the list of all the cements and solvents used  
  
63.6011(a) - retention of copies of reports / notifications  
  
63.6011(b) - tire production affected source records specified in Table 9 of Subpart XXXX  
  
63.6012 - records retention (general)  
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart XXXX]
  
7. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart XXXX, including the following sections:  
  
63.6004(b) - deviation reporting requirements  
  
63.6004(c)(3) - updated list inclusion in compliance report  
  
63.6009(a) - notifications - MACT General Provisions  
  
63.6010(a) - submit each applicable report in table 15 to this subpart  
  
63.6010(b) - requirements for semi-annual reports  
  
63.6010(c) - reporting requirements (general)  
  
63.6010(d) - compliance report - deviations and corrective action (if applicable)  
  
63.6010(e) - reporting in accordance with Title V operating permit  
  
63.6010(f), (g) - provision for reduced reporting, electronic reporting  
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart XXXX]
  
8. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart XXXX, including the following sections:  
  
63.5994(a) - Methods to determine the mass percent of HAP in cements and solvents  
  
63.5994(b)(1), (3), and (4) - Methods to demonstrate compliance with the HAP constituent emission limits in Table 1 to this subpart (option 1)  
  
63.5994(c)(1), (2), (3), and (5) - Methods to demonstrate compliance with the production-based emission limits in Table 1 to this subpart, option 2.



63.5994(f) - How to take credit for HAP emissions reductions when streams are combined (if applicable)

63.6004(a) - demonstrate continuous compliance with each applicable limit in Table 1 to this subpart using the methods specified in Table 10 to Subpart XXXX

63.6004(c)(1) - cement / solvent HAP verification, if applicable  
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart XXXX]

9. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the following miscellaneous requirements: Table 17 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
10. The following rule is applicable to this facility: 40 CFR 60.540 et seq. (New Source Performance Standards NSPS, Subpart BBB – Rubber Tire Manufacturing Industry)

The permittee shall comply with the applicable emission limitation of 40 CFR 60.542(a)(5), (6), and (7):

- a) For each green tire spraying operation where only water-based sprays are used:
  - (1) 1.2 grams (0.0026 lb) of VOC (volatile organic compound) per tire sprayed with an inside green tire spray for each month; and
  - (2) 9.3 grams (0.021 lb) of VOC per tire sprayed with an outside green tire spray for each month.
- b) For each green tire spraying operation where only organic solvent-based sprays are used: Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon the duration of the compliance period:
  - (1) 3,220 kg (7,099 lb) of VOC per 28 days,
  - (2) 3,340 kg (7,363 lb) of VOC per 29 days,
  - (3) 3,450 kg (7,606 lb) of VOC per 30 days,
  - (4) 3,570 kg (7,870 lb) of VOC per 31 days, or
  - (5) 4,030 kg (8,885 lb) of VOC per 35 days.
- c) Each green tire spraying operation where both water-based and organic solvent-based sprays are used shall comply with the provisions of both 10.a (water-based) and 10.b (solvent-based), as applicable.

11. The following is the list of the insignificant emissions units at this facility that are 'affected facilities' subject to 40 CFR 60.540 et seq. (Subpart BBB): emissions units K003, K006, K010, K011, and K012. [See also B.15.]



12. In conjunction with B.10 and B.11, the permittee shall comply with the following monitoring and/or record keeping requirements:
- a) Each owner or operator that is required to conduct monthly performance tests, as specified in B.14.a), shall maintain records of the results of all monthly tests.  
[40 CFR 60.545(e)]
  - b) If the permittee verifies formulation data under the provisions of B.14.d), the permittee shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the material.  
[40 CFR 60.545(f)]
13. In conjunction with B.10 and B.11, the permittee shall comply with the following reporting requirements:
- a) Once every 6 months, the permittee shall report, as applicable, each monthly average VOC emission rate per tire, and each VOC monthly emissions rate, that exceeds the applicable VOC emission limit specified in 10.a).  
  
In accordance with 40 CFR 60.546(g), the semi-annual reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. The reports shall be submitted electronically through Ohio EPA Air Services.  
[40 CFR 60.546(f)]
  - b) Under the provisions of 14.d), if applicable, the permittee shall report annually the formulation data or Method 24 results to verify the VOC content of the water-based materials in use. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.  
  
If the material formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the material shall be reported within 30 days of the change. The reports shall be submitted electronically through Ohio EPA Air Services.  
[40 CFR 60.546(j)]
14. In conjunction with B.10 and B.11, the permittee shall comply with the following testing/ compliance demonstration requirements:
- a) The permittee shall conduct the performance test in B.14.b) or B.14.c), as applicable, each month, except as provided in 14.d).  
  
40 CFR 60.8(d) does not apply to the monthly performance test procedures required by Subpart BBB. 40 CFR 60.8(f) does not apply when Method 24 is used.  
[40 CFR 60.543(b)(1) and (a)]
  - b) For each green tire spraying operation (uncontrolled) where organic solvent-based sprays are used, the permittee shall use the following procedure to determine compliance with the applicable (depending upon duration of compliance period) uncontrolled monthly VOC use limit specified under B.10.b):
    - (1) Determine the density and weight fraction VOC (including dilution VOC) of each green tire spray from its formulation or by analysis of the spray using 40 CFR 60, Appendix A,



Method 24. If a dispute arises where formulation data is used, the Ohio EPA may require the permittee to analyze the spray using Method 24.

(2) Calculate the total mass of VOC used at the affected facility for the month ( $M_O$ ) by the following procedure:

(a) For systems where green tire spray is delivered in batch or via a distribution system that serves only this emissions unit:

$$M_O = \sum_{i=1}^a LC_i DC_i WO_i$$

Where:

LC = volume of spray material used for a month (liters (gallons))

DC = density of spray material (grams per liter (lb per gallon))

WO = weight fraction of VOC in a spray material

“a” equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

(b) For systems where green tire spray is delivered via a common distribution system that also serves other affected facilities:

(i) Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^b LC_i DC_i WO_i$$

Where:

$LC_i DC_i WO_i$  as in B.14.b)(2)(b) above.

“b” equals the number of different sprays used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

(ii) Determine the fraction ( $F_O$ ) of M used at the affected facility by comparing the production records and process specifications for the material cemented at the affected facility for the month to the production records and process specifications for the material cemented at all other facilities served by the common distribution system for the month or by another procedure acceptable to the US EPA Administrator.

(iii) Calculate the total monthly mass of VOC used at the affected facility for the month ( $M_O$ ):  $M_O = MF_O$

(3) Determine the time duration of the monthly compliance period ( $T_d$ ).  
[40 CFR 60.543(c)]

c) For each green tire spraying operation where water-based cements or sprays containing 1.0 percent, by weight, of VOC or more are used (inside and/or outside), the permittee shall use the following procedure to determine compliance with the VOC emission per tire limit specified under B.10.a:

(1) Determine the density and weight fraction VOC as determined in B.14.b)(1).

(2) Calculate the total mass of VOC used at the affected facility for the month ( $M_o$ ) as determined in B.14.b)(2).

(3) Determine the total number of tires cemented or sprayed at the affected facility for the month ( $T_o$ ) by the following procedure: For a green tire spraying operation that uses water-based inside green tire sprays,  $T_o$  equals the number of green tires that receive an application of water-based inside green tire spray for the month.

(4) Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month ( $G$ ):

$$G = M_o / T_o$$

(5) Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month ( $N$ ):  $N = G$

[40 CFR 60.543(d)]

d) If the permittee uses only water-based materials (inside and/or outside) containing less than 1.0 percent, by weight, of VOC, the permittee is not required to conduct the monthly performance test in B.14.b) and B.14.c). In lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each green tire spray, provided the formulation has not changed during the previous 12 months. If the material formulation changes, formulation data or Method 24 analysis of the new material shall be conducted to determine the VOC content of the material and reported to Ohio EPA within 30 days as required under B.13.b) of this permit and 40 CFR 60.546(j).

[40 CFR 60.543(b)(4)]

e) In determining compliance for each green tire spraying operation, the permittee shall include only those tires defined under 40 CFR 60.541(a) when determining  $T_o$ .

[40 CFR 60.543(m)]

f) Method 24 or formulation data shall be used for the determination of the VOC content of green tire sprays. In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.

[40 CFR 60.547(a)(1)]

15. In addition to the insignificant emissions units in B.11, the following significant emissions unit(s) contained in this permit are subject to 40 CFR, Part 60, Subpart BBB: K002 and K008. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the Internet from the



Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District office or local air agency. See also Section C. - Emissions Unit Terms and Conditions, for K002 and K008.

16. Miscellaneous requirements: The emissions units of B.11 and B.15 are subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
17. The emissions unit(s) contained in B.3 are subject to 40 CFR, Part 63, Subpart XXXX. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
18. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K003 & K006	Green Tire Painter #10 & #12
K010	Green Tire Painter #11 – PTI# P0104902 issued 06/17/09
K011	Green Tire Painter #8 - PTI# P0104902 issued 06/17/09
K012	Green Tire Painter #9 - PTI# P0104902 issued 06/17/09
L001 – L015	Cold Cleaner Degreasers #1 -15
P029	Emergency Generator – PBR11030 issued 08/05/13
P030 & P031	Emergency Fire Pumps (2) – PBR11043 issued 10/25/13
P154 – P156	(3) Tire Curing Presses - PTI# 03-16336 issued 03/24/05
P157 – P166	(10) Tire Curing Presses -PTI# 03-16354 issued 07/21/05
P167 – P168	(2) Tire Curing Presses - PTI# 03-17152 issued 05/30/06
P169 – P178	(10) Tire Curing Presses - PTI# 03-17190 issued 08/08/06
P181 & P189	(2) Tire Curing Presses - PTI# 03-17293 issued 03/13/07
P190 – P195	(6) Tire Curing Presses - PTI# P0106765 issued 09/15/10
P201 – P215	(15) Tire Curing Presses - PTI# P0106766 issued 09/15/10
P318 – P321	(4) Tire Curing Presses - PTI# P0107873 issued 04/13/11
P322 – P335	(14) Tire Curing Presses - PTI# P0117688 issued 10/22/14
P336 – P346	(11) Tire Curing Presses - PTI# P0118426 issued 02/08/15
P356 – P360	(5) Tire Curing Presses - PTI# P0118426 issued 02/08/15
P801 – P810	(10) Tire Curing Presses - PTI# 03-13333 issued 12/15/99
P811 & P815	(2) Tire Curing Presses - PTI# P0106763 issued 09/15/10
P819 – P839	(21) Tire Curing Presses - PTI# P0106763 issued 09/15/10
P840	(1) Tire Curing Press - PTI# P0106767 issued 09/15/10
P847 – P867	(21) Tire Curing Presses - PTI# 03-13536 issued 11/16/00
P871 & P872	(2) Tire Curing Presses - PTI# P0106772 issued 09/15/10



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P876 - P891	(16) Tire Curing Presses - PTI# P01016758 issued 09/15/10
P892	(1) Tire Curing Press - PTI# 03-16241 issued 09/28/04
P893 - P899	(7) Tire Curing Presses - PTI# 03-16336 issued 03/24/05
R009	R & D Spraybooth



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**Permit Number:** P0119900  
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## **C. Emissions Unit Terms and Conditions**



**1. B005, 118 MMBTU/HR Natural Gas/No. 2 Fuel Oil Fired Boiler**

**Operations, Property and/or Equipment Description:**

118 MMBTU/HR Natural Gas/No. 2 Fuel Oil Fired Boiler (Stand-By Boiler)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10 (B)(1)	0.02 lb of particulate emissions (PE)/mmBtu of actual heat input
b.	OAC rule 3745-18-06(D)	1.60 lbs of sulfur dioxide (SO <sub>2</sub> )/mmBtu of actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-31-05 (PTI 03-927 issued April 1, 1980)	See b)(2)a.
e.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480-7575)  [In accordance with 63.7575, this emissions unit is an existing large boiler located at a major source of HAP emissions and subject to the applicable requirements specified in this section.]	See b)(2)e., c)(5) and c)(6)  63.7500(a) Table 3 requirements
f.	40 CFR 63.1-15 [40 CFR 63.7575 Table 10 of Subpart DDDDD]	Table 10 in Section 63.7575 of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. The requirements established under this Permit To Install (PTI) pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-10(B), 3745-18-06(D), 3745-17-07(A), and 3745-21-08(B).
  
  - b. This emissions unit is designed to burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler is subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart and must have a one-time energy assessment, performed in accordance with Table 3 #4 of the subpart.
    - i. The initial tune-up and one-time energy assessment must be completed no later than 1/31/16.
    - ii. The one-time energy assessment must be performed by a qualified energy assessor and must include the following:
      - (a) a visual inspection of the boiler system;
      - (b) an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
      - (c) an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
      - (d) a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
      - (e) a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
      - (f) a list of cost-effective energy conservation measures that are within the permittee's control;
      - (g) a list of the energy savings potential of the energy conservation measures identified; and
- a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

c) Operational Restrictions

- (1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.  
[OAC 3745-18-06(D) and OAC 3745-77-07(A)(1)]
- (2) The permittee shall burn only natural gas, and/or fuel oil No. 1/ No. 2 [as specified in c)(1)], in this emissions unit.  
[OAC 3745-77-07(A)(1)]
- (3) The permittee must have a tune-up and inspection completed annually (no more than 13 months after the previous tune-up and inspection) in accordance with the requirements of 40 CFR 63.7540(a)(10) and Table 3 #3 of Subpart DDDDD.  
  
[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]
- (4) The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.  
  
[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.  
  
The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.  
[OAC rules 3745-18-04(E)(3) and 3745-18-04(I), and OAC 3745-77-07(C)(1)]
- (2) For each day during which the permittee burns a fuel other than natural gas, or fuel oil No. 1 or No. 2, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.  
[OAC 3745-77-07(C)(1)]
- (3) The permittee shall maintain monthly records of the type and quantity of fuel burned in these emissions units.



[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

- (4) The permittee shall maintain records of the following information for the boiler(s) in order to meet the record keeping requirements of 40 CFR 63.7525, 40 CFR 63.7555, 40 CFR 63.10(b) and (c), and to demonstrate compliance with the Subpart DDDDD:
- a. a copy of each notification and report that is submitted to comply with Part 63 Subpart DDDDD, including all documentation supporting the Initial Notification and all subsequent Notifications of Compliance Status and/or semiannual compliance reports;
  - b. records of performance test, fuel analysis, or other compliance demonstrations and as required by 63.10(b)(2)(viii);
  - c. if burning an alternative fuel in a boiler designed to burn gas 1 (subcategory) fuels, i.e., fuels other than natural gas, refinery gas, or gaseous fuels subject to another subpart or part of the CFR, the records of:
    - i. the total hours per calendar year that the alternative fuel was burned; and
    - ii. the total hours per calendar year that the boiler operated during periods of gas curtailment or gas supply emergencies.

These records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the allowable sulfur dioxide emission limitation. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Northwest District Office.

[OAC 3745-15-03(B)(1)(a), OAC 3745-15-03(C), OAC 3745-77-07(A)(3)(c), and OAC 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, or diesel fuel as specified in c)(2), was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1)]



- (3) The permittee shall submit, to the appropriate Ohio EPA District Office or Local Air Agency, the following notifications in accordance with the applicable requirements of 40 CFR 63.7545, 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4) and (6), and 40 CFR 63.9(b) through (h):
- a. The Notification of Compliance Status must contain the following:
    - i. A description of the facility boilers including:
      - (a) identification of the subcategory each boiler is in;
      - (b) the design heat input capacity of the/each unit;
      - (c) a description of the add-on controls used on each boiler;
      - (d) description of the fuel(s) burned,
      - (e) identification of fuel(s) that were determined to be a non-waste or fuel(s) processed from discarded non-hazardous secondary materials under 40 CFR 241.3; and
      - (f) the justification for the selection of fuel(s) burned during the compliance demonstration.
    - b. the following certification(s) of compliance, as applicable, must be signed by a responsible official:
      - i. certification that the facility has complied with the required initial tune-up in accordance with 40 CFR 63.7540(a)(10)(i) through (vi);
      - ii. for existing units, certification that the facility has completed a one-time energy assessment performed according to 40 CFR 63.7530(e) and that it is an accurate depiction of the facility at the time of the assessment; and
      - iii. except for boilers burning natural gas, refinery gas, or other gas 1 fuel, certification that no secondary materials that are solid waste were combusted in any affected unit;
    - c. if the unit is designed to burn natural gas, refinery gas, or other gas 1 fuels, and there are plans to use fuel other than natural gas, refinery gas, or other gas 1 fuel during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, a notification of alternative fuel use must be submitted within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. The notification must include the following information:
      - i. facility name and address;
      - ii. identification of the affected unit(s);
      - iii. the reason natural gas or equivalent fuel cannot be used;



- iv. the date when the natural gas curtailment was declared or the natural gas supply interruption began;
  - v. the type of alternative fuel to be used; and
  - vi. the dates when the alternative fuel use is expected to begin and end.
- d. if there are any plans to switch fuels or make a physical change to a boiler, and this fuel switch or change to the boiler may result in the applicability of a different subcategory, notification of the switch must be made at least 30 days prior to the date of the switch or change and this notification must identify:
- i. the name of the facility, the location of the source, the boiler(s) that will switch fuels or were physically changed;
  - ii. the applicable subcategory of the boiler(s) before and after the switch;
  - iii. the date on which the fuel switch or physical change occurred;
  - iv. the planned date for the fuel to be switched; and
  - v. the date of the notice.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

f) **Testing Requirements**

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

- a. Emission Limitation  
0.02 lb of PE per mmBtu actual heat input

Applicable Compliance Method

When firing natural gas, compliance may be determined by multiplying the maximum gas burning capacity of the emissions unit (0.118 mm cu. ft. /hour) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-2 (revised 7/98)] of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (118 mmBtu/hour).

When firing No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (843 gallons/hour) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (118 mmBtu/hour).

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC 3745-77-07(C)(1)]



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- b. Emission Limitation  
1.60 lbs of SO<sub>2</sub>/mmBtu of actual heat input

Applicable Compliance Method

Compliance with the allowable SO<sub>2</sub> emission limitation shall be demonstrated in accordance with the recordkeeping specified in d)(1).

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

[OAC 3745-77-07(C)(1)]

- c. Emission Limitation  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

- g) Miscellaneous Requirements

- (1) None.

**2. B006, 89.9 mmBTU/hour Natural Gas and Distillate Oil-Fired Boiler**

**Operations, Property and/or Equipment Description:**

89.9 mmBTU/hour Natural Gas and Distillate Oil-Fired Boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-7462 as modified September 9, 2003)	45.60 lbs sulfur dioxide (SO <sub>2</sub> )/hour; 200.00 tons SO <sub>2</sub> /year  14.11 lbs nitrogen oxide (NO <sub>x</sub> )/hour; 61.80 tons NO <sub>x</sub> /year  7.55 lbs carbon monoxide (CO)/hour; 33.10 tons CO/year  1.28 lbs particulate emissions (PE)/hour; 5.61 tons PE/year  0.98 lb organic compound (OC)/hour; 4.30 tons OC/year  See b)(2)a and b)(2)b.
b.	40 CFR 60.40c et seq. (NSPS Subpart Dc)	See b)(2)c and c)(1).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-10 (B)(1)	See b)(2)d.
e.	OAC rule 3745-18-06(D)	See b)(2)d.
f.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480-7575) [In accordance with 63.7575, this emissions unit is an existing large boiler located at a major source of HAP emissions and subject to the applicable requirements specified in this section.]	See b)(2)e., c)(5) and c)(6)  63.7500(a) Table 3 requirements



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR 63.1-15 [40 CFR 63.7575 Table 10 of Subpart DDDDD]	Table 10 in Section 63.7575 of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of low NO<sub>x</sub> burners.
- b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A) and 40 CFR 60.40c et seq. (NSPS Subpart Dc).
- c. The applicability of OAC rule 3745-17-07(A) and 40 CFR 60.43c (c) for this emissions unit overlap, and result in opacity restrictions as follows:
  - i. when firing natural gas: visible emissions not more than 20% opacity (6-minute average), except for one 6-minute period in any sixty minutes of not more than 60% opacity.
  - ii. when firing No. 2 fuel oil: visible emissions not more than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity. This requirement shall apply at all times, including periods of startup or shutdown lasting no longer than three hours, and malfunction periods which conform with OAC 3745-17-07(A)(3)(c).
- d. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. This emissions unit is designed to burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler is subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart and must have a one-time energy assessment, performed in accordance with Table 3 #4 of the subpart.
  - i. The initial tune-up and one-time energy assessment must be completed no later than 1/31/16.
  - ii. The one-time energy assessment must be performed by a qualified energy assessor and must include the following:
    - (a) a visual inspection of the boiler system;

- (b) an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
- (c) an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
- (d) a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
- (e) a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
- (f) a list of cost-effective energy conservation measures that are within the permittee's control;
- (g) a list of the energy savings potential of the energy conservation measures identified; and

a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

- f. The hourly SO<sub>2</sub>, NO<sub>x</sub>, CO, and OC emission limitations represent the potentials to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall combust oil in the affected facility that contains not greater than 0.5 weight percent sulfur.  
[OAC 3745-77-07(A)(1), PTI 03-7462, and 40 CFR 60.42c (d)]
- (2) The permittee shall burn only natural gas, and/or fuel oil No. 1/No. 2 in this emissions unit.  
[OAC 3745-77-07(A)(1) and PTI 03-7462]
- (3) The permittee must have a tune-up and inspection completed once every 5 years in accordance with the requirements of 40 CFR 63.7540(a)(10) and Table 3 #1 of Subpart DDDDD.  
[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]
- (4) The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.  
[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall keep records of fuel oil supplier certification, which shall include the following information:
  - a. The name of the oil supplier.
  - b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.
  - c. The sulfur content of the oil.  
[OAC 3745-77-07(C)(1), PTI 03-7462, and 40 CFR 60.48c (e)(11), and (f)]
- (2) The permittee shall record and maintain records of the amounts of each fuel combusted during each month.  
[OAC 3745-77-07(C)(1), PTI 03-7462, and 40 CFR 60.48c (g)(2)]
- (3) For each day during which the permittee burns a fuel other than natural gas, or fuel oil No. 1 or No. 2, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.  
[OAC 3745-77-07(C)(1) and PTI 03-7462]
- (4) The permittee shall maintain monthly records of the type and quantity of fuel burned in these emissions units.  
[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]
- (5) The permittee shall maintain records of the following information for the boiler(s) in order to meet the record keeping requirements of 40 CFR 63.7525, 40 CFR 63.7555, 40 CFR 63.10(b) and (c), and to demonstrate compliance with the Subpart DDDDD:
  - a. a copy of each notification and report that is submitted to comply with Part 63 Subpart DDDDD, including all documentation supporting the Initial Notification and all subsequent Notifications of Compliance Status and/or semiannual compliance reports;
  - b. records of performance test, fuel analysis, or other compliance demonstrations and as required by 63.10(b)(2)(viii);
  - c. if burning an alternative fuel in a boiler designed to burn gas 1 (subcategory) fuels, i.e., fuels other than natural gas, refinery gas, or gaseous fuels subject to another subpart or part of the CFR, the records of:
    - i. the total hours per calendar year that the alternative fuel was burned; and
    - ii. the total hours per calendar year that the boiler operated during periods of gas curtailment or gas supply emergencies.

These records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]



e) Reporting Requirements

- (1) The permittee shall submit reports of the records of fuel oil supplier certifications from d)(1). The report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), PTI 03-7462, and 40 CFR 60.48c (d), (e)(11), and (j)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, or diesel fuel as specified in c)(2), was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1) and PTI 03-7462]

- (3) The permittee shall submit, to the appropriate Ohio EPA District Office or Local Air Agency, the following notifications in accordance with the applicable requirements of 40 CFR 63.7545, 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4) and (6), and 40 CFR 63.9(b) through (h):

a. The Notification of Compliance Status must contain the following:

i. A description of the facility boilers including:

- (a) identification of the subcategory each boiler is in;
- (b) the design heat input capacity of the/each unit;
- (c) a description of the add-on controls used on each boiler;
- (d) description of the fuel(s) burned,
- (e) identification of fuel(s) that were determined to be a non-waste or fuel(s) processed from discarded non-hazardous secondary materials under 40 CFR 241.3; and
- (f) the justification for the selection of fuel(s) burned during the compliance demonstration.

b. the following certification(s) of compliance, as applicable, must be signed by a responsible official:

- i. certification that the facility has complied with the required initial tune-up in accordance with 40 CFR 63.7540(a)(10)(i) through (vi);
- ii. for existing units, certification that the facility has completed a one-time energy assessment performed according to 40 CFR 63.7530(e) and that it is an accurate depiction of the facility at the time of the assessment; and



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- iii. except for boilers burning natural gas, refinery gas, or other gas 1 fuel, certification that no secondary materials that are solid waste were combusted in any affected unit;
- c. if the unit is designed to burn natural gas, refinery gas, or other gas 1 fuels, and there are plans to use fuel other than natural gas, refinery gas, or other gas 1 fuel during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, a notification of alternative fuel use must be submitted within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. The notification must include the following information:
  - i. facility name and address;
  - ii. identification of the affected unit(s);
  - iii. the reason natural gas or equivalent fuel cannot be used;
  - iv. the date when the natural gas curtailment was declared or the natural gas supply interruption began;
  - v. the type of alternative fuel to be used; and
  - vi. the dates when the alternative fuel use is expected to begin and end.
- d. if there are any plans to switch fuels or make a physical change to a boiler, and this fuel switch or change to the boiler may result in the applicability of a different subcategory, notification of the switch must be made at least 30 days prior to the date of the switch or change and this notification must identify:
  - i. the name of the facility, the location of the source, the boiler(s) that will switch fuels or were physically changed;
  - ii. the applicable subcategory of the boiler(s) before and after the switch;
  - iii. the date on which the fuel switch or physical change occurred;
  - iv. the planned date for the fuel to be switched; and
  - v. the date of the notice.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

f) Testing Requirements

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

- a. Emission Limitation  
45.60 lbs SO<sub>2</sub>/hour



Applicable Compliance Method

The hourly emission limitation is based on the combustion of No. 2 fuel oil which represents a "worst case scenario" for SO<sub>2</sub> emissions. The hourly emission limitation was established by multiplying the maximum capacity of the boiler (89.90 mmBtu/hour), the heat content of No. 2 fuel oil (1 gallon/140,000 Btu), a maximum sulfur content of 0.5% wt, and an emission factor of (142 lbs SO<sub>2</sub> x wt% sulfur/1000 gallons of fuel oil) from AP-42 Section 1.3, Fuel Oil Combustion [9/98]. Therefore, provided compliance is shown with the maximum sulfur content of 0.5% wt, compliance with the hourly limitation will be assumed.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Methods 1- 4, and 6.  
[OAC 3745-77-07(C)(1) and PTI 03-7462]

- b. Emission Limitation  
14.11 lbs NO<sub>x</sub>/hour

Applicable Compliance Method

The hourly emission limitation is based on the combustion of no.2 fuel oil which represents a "worst case scenario" for NO<sub>x</sub> emissions. The hourly emission limitation was established by multiplying the maximum capacity of the boiler (89.9 mmBTU/hour) and an emission factor of 0.1570 lb of NO<sub>x</sub>/mmBTU (based on 2001 stack test while firing #2 fuel oil).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in Methods 1-4 and 7 of 40 CFR Part 60, Appendix A. [Compliance with this emission limitation was demonstrated on 10/21/11]

[OAC 3745-77-07(C)(1) and PTI 03-7462]

- c. Emission Limitation  
7.55 lbs carbon monoxide (CO)/hour

Applicable Compliance Method

The hourly emission limitation is based on the combustion of natural gas which represents a "worst case scenario" for CO emissions. The hourly emission limitation was established by multiplying the maximum gas burning capacity of 89,900 ft<sup>3</sup>/hour by an emission factor of 84 lbs of CO/mmft<sup>3</sup> of natural gas (AP-42 Section 1.4, Natural Gas Combustion [7/98]).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in Methods 1-4 and 10 of 40 CFR Part 60, Appendix A. [Compliance with this emission limitation was demonstrated on 10/21/11]

[OAC 3745-77-07(C)(1) and PTI 03-7462]



- d. Emission Limitation  
1.28 lbs PE/hour

Applicable Compliance Method

The hourly emission limitation is based on the combustion of no.2 fuel oil which represents a "worst case scenario" for PE. The hourly emission limitation was established by multiplying the maximum capacity of the boiler (89.9 mmBTU/hour), the heat content of No. 2 fuel oil (1 gallon/140,000 Btu), and an emission factor of 2 lb PE/1000 gallons of fuel oil from AP-42 Section 1.3, Fuel Oil Combustion [9/98].

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Methods 1- 5.

[OAC 3745-77-07(C)(1) and PTI 03-7462]

- e. Emission Limitation  
0.98 lb organic compounds (OC)/hour

Applicable Compliance Method

The hourly emission limitation is based on the combustion of natural gas which represents a "worst case scenario" for OC emissions. The hourly emission limitation was established by multiplying the maximum gas burning capacity of 89,900 ft<sup>3</sup>/hour by an emission factor of 11 lbs of TOC/mmft<sup>3</sup> of natural gas (AP-42 Section 1.4, Natural Gas Combustion [7/98]).

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC 3745-77-07(C)(1) and PTI 03-7462]

- f. Emission Limitations:  
200.00 tons SO<sub>2</sub>/year  
61.80 tons NO<sub>x</sub>/year  
33.10 tons CO/year  
5.61 tons PE/year  
4.30 tons OC/year

Applicable Compliance Methods

The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-7462]

- g. Visible Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average [See b)(2)c.]



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Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC 3745-77-07(C)(1) and PTI 03-7462]

g) Miscellaneous Requirements

- (1) This emissions unit is subject to Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.



**3. K002, Manual/Automatic Tread End Cement Station (Spray and Brush Application)**

**Operations, Property and/or Equipment Description:**

Manual/Automatic Tread End Cement Station (Spray and Brush Application)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 60.540 et seq. (NSPS Subpart BBB)	For tread end cementing operation: 10 grams (0.022 lb) of volatile organic compounds (VOC) per tire cemented (monthly average) [40 CFR 60.542(a)(3)]
b.	OAC rule 3745-31-05(D) (PTI 03-17298 issued August 28, 2008)	30.00 tons of VOC per rolling 12-month period, for tread end cement usage (See b)(2)a.)
c.	OAC rule 3745-31-05(A)(3)	<u>Tread End Cement Usage</u> 18.00 lbs of VOC/hour <u>Clean-Up Material Usage</u> 1070.00 lbs VOC/month; 6.42 tons VOC/year
d.	OAC rule 3745-21-09(X)(1)	See b)(2)b.
e.	OAC rule 3745-17-11(C)	See c)(2), and c)(3).
f.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014)  [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - tread end cement operation' subject to the emission limitations /control requirements specified in this section.]	Table 1 to Subpart XXXX:  Option 1 - HAP constituent option; or Option 2 - production-based option  See b)(2)d.
g.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. Annual emissions shall not exceed 30.00 tons of VOC, based upon a rolling, 12-month summation of the monthly emissions, for tread end cement usage. The emission limitation is based on input restrictions [see c)(1)] for the purpose of establishing federally enforceable limitations below 'significant increase' threshold for "Prevention of Significant Deterioration" (PSD) applicability.
- b. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X)(1) pursuant to OAC rule 3745-21-09(X)(2)(d).
- c. The hourly VOC emission limitation for cement represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
- d. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for this emissions unit (see Sections B.2 through B.9).

c) Operational Restrictions

- (1) The maximum annual tread end cement usage for this emissions unit shall not exceed 10,000 gallons per year, based upon a rolling 12-month summation of the gallon usage. The VOC content of the tread end cement shall not exceed 6.00 pounds per gallon, as applied.  
[OAC 3745-77-07(A)(1) and PTI 03-17298]
- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.  
[OAC rule 3745-17-11(C)(1) and (2)(b), and OAC rule 3745-77-07(C)(1)]
- (3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.  
[OAC rule 3745-17-11(C)(2)(e), and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) Each owner or operator that is required to conduct monthly performance tests, as specified in f)(1), shall maintain records of the results of all monthly tests.  
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.545(e)]

- (2) If the permittee verifies formulation data under the provisions of f)(4), the permittee shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the material.  
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.545(f)]
- (3) The permittee shall collect and record the following information each month for all coating (cement) materials for this emissions unit:
  - a. the company name or identification for each coating material employed;
  - b. the volume, in gallons, of each coating material employed;
  - c. the VOC content of each coating material employed, in pounds per gallon, as applied;
  - d. the VOC emission rate, in pounds, for each coating material employed [d)(3)b times d)(3)c];
  - e. the total VOC emission rate from all coating materials employed [summation of d)(3)d], in pounds or tons; and
  - f. the rolling, 12-month VOC emission rates, i.e. rolling 12-month total of d)(3)e, in tons.  
[OAC 3745-77-07(C)(1) and PTI 03-17298]
- (4) The permittee shall collect and record the following information each month for all clean-up materials used in this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the VOC content, in pounds per gallon, of each cleanup material employed;
  - d. the total VOC emission rate, in pounds, for each cleanup material employed [d)(4)b times d)(4)c]; and
  - e. the total VOC emission rate from all cleanup materials employed [summation of d)(4)d], in pounds or tons; and
  - f. the annual, year-to-date, VOC emissions, in tons, from all cleanup materials employed [summation of d)(4)e] for each calendar month to date from January to December.  
[OAC 3745-77-07(C)(1) and PTI 03-17298]
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Northwest District Office upon request. [OAC 3745-17-11(C)(2)(a), and OAC 3745-77-07(C)(1)]



- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]

- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]

- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Northwest District Office.

[OAC rule 3745-17-11(C)(2)(d) and (f), and OAC 3745-77-07(C)(1)]

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g), and OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) Once every 6 months, the permittee shall report, as applicable, each monthly average VOC emission rate that exceeds the VOC emission limit per tire specified in b)(1)a. [At the time of permit processing, the permittee is complying under the averaging period of 'calendar month', under 40 CFR 60.546(b).]

In accordance with 40 CFR 60.546(g), the semi-annual reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.546(f)]



- (2) Under the provisions of f)(4), if applicable, the permittee shall report annually the formulation data or Method 24 results to verify the VOC content of the water-based materials in use. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

If the material formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the material shall be reported within 30 days of the change. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.546(j)]

- (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

- a. any exceedances of the VOC content restriction of c)(1);
- b. any exceedances of the cement usage restriction of c)(1);
- c. any exceedances of the rolling, 12-month VOC limitation specified in b)(1)b;
- d. any exceedances of the monthly VOC limitation for clean-up specified in b)(1)c; and
- e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations occurred during the quarter.

[OAC 3745-15-03(B)(1)(a) and OAC 3745-15-03(C); and OAC 3745-77-07(C)(1)]

- (4) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Northwest District Office.

[OAC 3745-77-07(C)(1) and PTI 03-17298]

f) Testing Requirements

- (1) The permittee shall conduct the performance test in f)(2) and f)(3) each month, except as provided in f)(4).

40 CFR 60.8(d) does not apply to the monthly performance test procedures required by Subpart BBB. 40 CFR 60.8(f) does not apply when Method 24 is used.

[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(b)(1) and (a)]

- (2) The permittee shall use the following procedure to calculate the total mass of VOC used at the affected facility for the month ( $M_O$ ) by the following procedure:



- a. For systems where cement is delivered in batch or via a distribution system that serves only this emissions unit:

$$M_o = \sum_{i=1}^a LC_i DC_i WO_i$$

Where:

LC = volume of cement material used for a month (liters (gallons))

DC = density of cement material (grams per liter (lb per gallon))

WO = weight fraction of VOC in a cement material

“a” equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

- b. For systems where cement is delivered via a common distribution system that also serves other affected facilities:

- i. Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^b LC_i DC_i WO_i$$

Where:

LC<sub>i</sub> DC<sub>i</sub> WO<sub>i</sub> as in f)(3)a above.

“b” equals the number of different cements used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

- ii. Determine the fraction (F<sub>o</sub>) of M used at the affected facility by comparing the production records and process specifications for the material cemented at the affected facility for the month to the production records and process specifications for the material cemented at all other facilities served by the common distribution system for the month or by another procedure acceptable to the US EPA Administrator.

- iii. Calculate the total monthly mass of VOC used at the affected facility for the month (M<sub>o</sub>): M<sub>o</sub> = MF<sub>o</sub>

[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(c)(2)]

- (3) The permittee shall use the following procedure to determine compliance with the VOC emission per tire limit specified in b)(1)a:



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- a. Determine the density and weight fraction VOC (including dilution VOC) of each cement from its formulation or by analysis of the cement using 40 CFR 60, Appendix A, Method 24. If a dispute arises where formulation data is used, the Ohio EPA may require the permittee to analyze the cement using Method 24.
  - b. Calculate the total mass of VOC used at the affected facility for the month ( $M_o$ ) as specified under f)(2).
  - c. Determine the total number of tires cemented or sprayed at the affected facility for the month ( $T_o$ ) by the following procedure: For a tread end cementing operation,  $T_o$  equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.
  - d. Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month ( $G$ ):  
$$G = M_o / T_o$$
  - e. Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month ( $N$ ):  $N = G$   
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(d), and (c)(1)]
- (4) If the permittee uses only water-based materials (inside and/or outside) containing less than 1.0 percent, by weight, of VOC, the permittee is not required to conduct the monthly performance test in f)(2) and f)(3). In lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement, provided the formulation has not changed during the previous 12 months. If the material formulation changes, formulation data or Method 24 analysis of the new material shall be conducted to determine the VOC content of the material and reported to Ohio EPA within 30 days as required under e)(2) of this permit for this emissions unit, and 40 CFR 60.546(j).  
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(b)(4)]
  - (5) In determining compliance for each tread end cementing operation, the permittee shall include only those tires defined under 40 CFR 60.541(a) when determining  $T_o$ .  
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(m)]
  - (6) Method 24 or formulation data shall be used for the determination of the VOC content of cements (or clean-up materials). In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.  
[OAC 3745-77-07(C)(1) and PTI 03-17298, and 40 CFR 60.547(a)(1)]
  - (7) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



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- a. Emission Limitation  
18.00 lbs of VOC hour (for cements)

Applicable Compliance Method

The hourly allowable VOC emission limitation represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.00 gallons/hour) by the maximum allowable VOC content of the coating (6.00 lbs/gallon).

[OAC 3745-77-07(C)(1) and PTI 03-17298]

- b. Emission Limitations:  
1070.00 lbs VOC/month; 6.42 tons VOC/year (for clean-up solvents)

Applicable Compliance Method

Compliance with the monthly limitation shall be based on the record keeping requirements as specified in d)(4)d.

The annual allowable limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-17298]

- c. Emission Limitation:  
30.00 tons VOC per rolling, 12-month period, for tread end cement usage

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(3).

[OAC 3745-77-07(C)(1) and PTI 03-17298]

g) **Miscellaneous Requirements**

- (1) This emissions unit is subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.



**4. K008, Automatic/Manual Tread End Cementer**

**Operations, Property and/or Equipment Description:**

Automatic/Manual Tread End Cementer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 60.540 et seq. (NSPS Subpart BBB)	For tread end cementing operation: 10 grams (0.022 lb) of volatile organic compounds (VOC) per tire cemented (monthly average) [40 CFR 60.542(a)(3)]
b.	OAC rule 3745-31-05(D) (PTI 03-16310 issued June 2, 2005)	21.00 tons of VOC per rolling 12-month period, for tread end cement usage (See b)(2)a.)
c.	OAC rule 3745-31-05(A)(3)	<u>Tread End Cement Usage</u> 18.00 lbs of VOC /hour  <u>Clean-Up Material Usage</u> 35.20 lbs VOC /day; 6.42 tons VOC /year
d.	OAC rule 3745-21-09(X)(1)	See b)(2)b.
e.	OAC rule 3745-17-11(C)	See c)(2), and c)(3).
f.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014)  [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - tread end cement operation' subject to the emission limitations /control requirements specified in this section.]	Table 1 to Subpart XXXX:  Option 1 - HAP constituent option; or Option 2 - production-based option  See b)(2)d.
g.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. Annual emissions shall not exceed 21.00 tons of VOC, based upon a rolling, 12-month summation of the monthly emissions, for tread end cement usage. The emission limitation is based on input restrictions [see c)(1)] for the purpose of establishing federally enforceable limitations below 'significant increase' threshold for "Prevention of Significant Deterioration" (PSD) applicability.
- b. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X)(1) pursuant to OAC rule 3745-21-09(X)(2)(d).
- c. The hourly VOC emission limitation for cement and daily VOC emission limitation for clean-up represent the potential(s) to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
- d. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for this emissions unit (see Sections B.2 through B.9).

c) Operational Restrictions

- (1) The maximum annual tread end cement usage for this emissions unit shall not exceed 7000 gallons per year, based upon a rolling 12-month summation of the gallon usage. The VOC content of the tread end cement shall not exceed 6.00 pounds per gallon, as applied.  
[OAC 3745-77-07(A)(1) and PTI 03-16310]
- (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.  
[OAC rule 3745-17-11(C)(1) and (2)(b), and OAC rule 3745-77-07(C)(1)]
- (3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.  
[OAC rule 3745-17-11(C)(2)(e), and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) Each owner or operator that is required to conduct monthly performance tests, as specified in f)(1), shall maintain records of the results of all monthly tests.  
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.545(e)]



- (2) If the permittee verifies formulation data under the provisions of f)(4), the permittee shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the material.  
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.545(f)]
  
- (3) The permittee shall collect and record the following information each month for all coating (cement) materials for this emissions unit:
  - a. the company name or identification for each coating material employed;
  - b. the volume, in gallons, of each coating material employed;
  - c. the VOC content of each coating material employed, in pounds per gallon, as applied;
  - d. the VOC emission rate, in pounds, for each coating material employed [d)(3)b times d)(3)c];
  - e. the total VOC emission rate from all coating materials employed [summation of d)(3)d], in pounds or tons; and
  - f. the rolling, 12-month VOC emission rates, i.e. rolling 12-month total of d)(3)e, in tons.  
[OAC 3745-77-07(C)(1) and PTI 03-16310]
  
- (4) The permittee shall collect and record the following information each month for all clean-up materials used in this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the VOC content, in pounds per gallon, of each cleanup material employed;
  - d. the total VOC emission rate, in pounds, for each cleanup material employed [d)(4)b times d)(4)c];
  - e. the total VOC emission rate from all cleanup materials employed [summation of d)(4)d], in pounds or tons;
  - f. the total number of days the emissions unit was in operation; and
  - g. the average daily VOC emission rate for all cleanup materials, [d)(4)e/d)(4)f], in pounds per day; and
  - h. the annual, year-to-date, VOC emissions, in tons, from all cleanup materials employed [summation of d)(4)e] for each calendar month to date from January to December.  
[OAC 3745-77-07(C)(1) and PTI 03-16310]

- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Northwest District Office.  
[OAC 3745-17-11(C)(2)(a), and OAC 3745-77-07(C)(1)]
- (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.  
[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.  
[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Northwest District Office.

[OAC rule 3745-17-11(C)(2)(d) and (f), and OAC 3745-77-07(C)(1)]

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.  
[OAC rule 3745-17-11(C)(2)(f) and (g), and OAC 3745-77-07(C)(1)]
- e) Reporting Requirements
- (1) Once every 6 months, the permittee shall report, as applicable, each monthly average VOC emission rate that exceeds the VOC emission limit per tire specified in b)(1)a. [At the time of permit processing, the permittee is complying under the averaging period of 'calendar month', under 40 CFR 60.546(b).]



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In accordance with 40 CFR 60.546(g), the semi-annual reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.546(f)]

- (2) Under the provisions of f)(4), if applicable, the permittee shall report annually the formulation data or Method 24 results to verify the VOC content of the water-based materials in use. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

If the material formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the material shall be reported within 30 days of the change. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.546(j)]

- (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. any exceedances of the VOC content restriction of c)(1);
  - b. any exceedances of the cement usage restriction of c)(1);
  - c. any exceedances of the rolling, 12-month VOC limitation specified in b)(1)b;
  - d. any exceedances of the daily VOC limitation for clean-up specified in b)(1)c, as shown by records from d)(4)g; and
  - e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

[OAC 3745-15-03(B)(1)(a) and OAC 3745-15-03(C); and OAC 3745-77-07(C)(1)]

- (4) If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Northwest District Office.

[OAC 3745-77-07(C)(1) and PTI 03-16310]



- (5) The permittee shall submit annual reports that summarize the actual annual VOC emissions, in tons, for clean-up material usage in this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year. The reports shall be submitted electronically through Ohio EPA Air Services. [OAC 3745-77-07(C)(1) and PTI 03-16310]

f) Testing Requirements

- (1) The permittee shall conduct the performance test in f)(2) and f)(3) each month, except as provided in f)(4).

40 CFR 60.8(d) does not apply to the monthly performance test procedures required by Subpart BBB. 40 CFR 60.8(f) does not apply when Method 24 is used.

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(b)(1) and (a)]

- (2) The permittee shall use the following procedure to calculate the total mass of VOC used at the affected facility for the month (M<sub>O</sub>) by the following procedure:

- a. For systems where cement is delivered in batch or via a distribution system that serves only this emissions unit:

$$M_O = \sum_{i=1}^a LC_i DC_i WO_i$$

Where:

LC = volume of cement material used for a month (liters (gallons))

DC = density of cement material (grams per liter (lb per gallon))

WO = weight fraction of VOC in a cement material

“a” equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

- b. For systems where cement is delivered via a common distribution system that also serves other affected facilities:

- i. Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^b LC_i DC_i WO_i$$

Where:

LC<sub>i</sub> DC<sub>i</sub> WO<sub>i</sub> as in f)(3)a above.



“b” equals the number of different cements used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

- ii. Determine the fraction ( $F_o$ ) of M used at the affected facility by comparing the production records and process specifications for the material cemented at the affected facility for the month to the production records and process specifications for the material cemented at all other facilities served by the common distribution system for the month or by another procedure acceptable to the US EPA Administrator.
- iii. Calculate the total monthly mass of VOC used at the affected facility for the month ( $M_o$ ):  $M_o = MF_o$

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(c)(2)]

(3) The permittee shall use the following procedure to determine compliance with the VOC emission per tire limit specified in b)(1)a):

- a. Determine the density and weight fraction VOC (including dilution VOC) of each cement from its formulation or by analysis of the cement using 40 CFR 60, Appendix A, Method 24. If a dispute arises where formulation data is used, the Ohio EPA may require the permittee to analyze the cement using Method 24.
- b. Calculate the total mass of VOC used at the affected facility for the month ( $M_o$ ) as specified under f)(2).
- c. Determine the total number of tires cemented or sprayed at the affected facility for the month ( $T_o$ ) by the following procedure: For a tread end cementing operation,  $T_o$  equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.
- d. Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month (G):

$$G = M_o/T_o$$

- e. Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month (N):  $N = G$

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(d), and (c)(1)]

(4) If the permittee uses only water-based materials (inside and/or outside) containing less than 1.0 percent, by weight, of VOC, the permittee is not required to conduct the monthly performance test in f)(2) and f)(3). In lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement, provided the formulation has not changed during the previous 12 months. If the material formulation changes, formulation data or Method 24 analysis of the new material shall be conducted to determine the VOC content of the material and reported to Ohio EPA within 30 days as required under e)(2) of this permit for this emissions unit, and 40 CFR 60.546(j).

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(b)(4)]

- (5) In determining compliance for each tread end cementing operation, the permittee shall include only those tires defined under 40 CFR 60.541(a) when determining  $T_o$ .  
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(m)]
  
- (6) Method 24 or formulation data shall be used for the determination of the VOC content of cements (or clean-up materials). In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.  
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.547(a)(1)]
  
- (7) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
18.00 lbs of VOC /hour (for cements)  
  
Applicable Compliance Method  
The hourly allowable VOC emission limitation represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.00 gallons/hour) by the maximum allowable VOC content of the coating (6.00 lbs/gallon).  
[OAC 3745-77-07(C)(1) and PTI 03-16310]
  
  - b. Emission Limitation  
35.20 lbs of VOC /day (for clean-up solvents)  
  
Applicable Compliance Method  
The daily allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum daily solvent usage rate (5.62 gallons per day) by the maximum VOC content of the material (6.26 pounds per gallon).  
[OAC 3745-77-07(C)(1) and PTI 03-16310]
  
  - c. Emission Limitation  
6.42 tons VOC /year (for clean-up solvents)  
  
Applicable Compliance Method  
Compliance shall be based on the record keeping requirements as specified in d)(4)e.  
[OAC 3745-77-07(C)(1) and PTI 03-16310]
  
  - d. Emission Limitation  
21.00 tons VOC per rolling, 12-month period, for tread end cement usage  
  
Applicable Compliance Method:  
Compliance shall be based on the record keeping requirements as specified in d)(3).  
[OAC 3745-77-07(C)(1) and PTI 03-16310]



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g) Miscellaneous Requirements

- (1) This emissions unit is subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

- (2) Section B (the "Air Toxics Policy" evaluation) of PTI 03-16310 is no longer applicable, due to applicability of MACT Subpart XXXX for this emissions unit.



**5. P032, Carbon Black Unloading and Transfer System**

**Operations, Property and/or Equipment Description:**

Carbon Black Unloading and Transfer System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.



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g) Miscellaneous Requirements

- (1) None.

**6. P135, Banbury Mixer 1 (27)**

**Operations, Property and/or Equipment Description:**

Banbury Mixer 1 (includes mixer charge door/drop door)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-7432 as modified August 5, 2003)	1.20 lbs particulate emissions (PE) /hour; 5.26 tons PE /year  1.61 lbs of organic compounds (OC)/hour, 7.03 tons OC /year
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving each emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and,
  - e. any corrective actions taken to eliminate the abnormal visible emissions.[OAC 3745-77-07(C)(1) and PTI 03-7432]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.  
[OAC 3745-77-07(C)(1) and PTI 03-7432]

f) Testing Requirements

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

- a. Emission Limitations:  
1.20 lb PE/hour; 5.26 tons PE/year

Applicable Compliance Method

Compliance with the hourly limitation may be determined by multiplying the maximum outlet concentration of 0.00018 gr/dscf by the maximum volumetric air flow rate (16,250 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1-5.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance



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with the hourly limitation is shown, compliance with the annual limitation shall be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-7432]

b. Emission Limitations:

1.61 lbs of OC/hour; 7.03 tons OC/year

Applicable Compliance Method

The hourly OC emission limitation represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 41,583 lbs/hour and an emission factor of  $3.86 \times 10^{-5}$  lb of OC/lb of rubber processed (AP-42 Section 4.12-11 [6/99 Draft]).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.

The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000.

Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-7432]

g) Miscellaneous Requirements

(1) None.

**7. P136, Banbury Mixer (Final/Silica)**

**Operations, Property and/or Equipment Description:**

Banbury Mixer (Final/Silica)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)h. and d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI P0117977 issued 11/21/2014)	0.17 lb of particulate matter 10 microns or less in size (PM10)/hour  0.74 ton of PM10/year  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average  8.26 lbs of volatile organic compounds (VOC)/hour  60.00 tons of VOC/rolling 12-month period from emissions units P136, P137, and P140 combined [see b(2)a.]  See b)(2)b. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	ORC rule 3704.03(T)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)f.
f.	OAC rule 3745-17-07(A)	See b)(2)g.
g.	40 CFR Part 63, Subpart XXXX	See b)(2)h.
h.	ORC rule 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(3)

(2) Additional Terms and Conditions

- a. The annual limitation represents the potential emissions from P136, P137, and P140 based on inherent physical limitations associated with the production of mixed rubber. These emissions units are used to produce mixed rubber (both regular and silica rubber) which is utilized in subsequent manufacturing processes for the production of pneumatic tires. The production of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, VOC emissions are physically limited to 60.00 tons per rolling 12-month period from P136, P137, and P140.
- b. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:
  - i. 0.17 lb of PM10/hour;
  - ii. 0.74 ton of PM10/year;
  - iii. Visible PE shall not exceed 5% opacity, as a six-minute average;
  - iv. 8.26 lbs of VOC/hour; and
  - v. 60.00 tons of VOC per rolling 12-month period from emissions units P136, P137, and P140 combined.

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

- c. The Best Available Technology (BAT) requirement for PM10 emissions under OAC rule 3745-31-05(A)(3), as effective 11/30/01 has been determined to be compliance with the voluntary restriction to install a dust collection system with a design control efficiency of at least 95% control of PM10 established in accordance with OAC rule 3745-31-05(F) [See b)(2)b.].

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

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State



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Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12/01/06 will no longer apply.

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

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

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

- e. The BAT requirement for VOC emissions under ORC rule 3704.03(T) has been determined to be compliance with the rolling 12-month emission limitation established under OAC rule 3745-31-05(F).
- f. The uncontrolled mass rate of particulate emissions from each unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 does not apply because the facility is located in Hancock County.
- g. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- h. Pursuant to 40 CFR 63.5982(B)(4), there are no emission limitations or other requirements for "rubber processing" affected sources of 40 CFR Part 63 Subpart XXXX.
- i. The hourly VOC limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) **Operational Restrictions**

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [See b)(2)b.]:
  - a. This emissions unit shall be vented to a dust collection system capable of achieving 95% removal efficiency for filterable particulate emissions. [OAC rule 3745-77-07(A)(1) and PTI P0117977]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:
  - a. Identification of each type of mixing operation performed (master mixing, final mixing, 2<sup>nd</sup> pass silica mixing, or 3<sup>rd</sup> pass silica mixing);
  - b. Amount of rubber, in pounds, mixed for each type of mixing operation;
  - c. Calculated VOC emissions from each type of mixing operation using the following equation:  
  
$$\text{lbs of VOC emissions} = (\text{lbs of rubber mixed}) \times (\text{VOC emission factor* in lbs of VOC/lb of rubber})$$
  
  
\* VOC emission factors from AP-42, Section 4.12 and from stack testing performed by the company shall be used in the emission calculation.
  - d. Total VOC emissions from all mixing operations, in pounds [summation of d)(1)c. for all types of mixing operations]; and
  - e. The rolling 12-month summation of VOC emissions from all mixing operations [summation of d)(1)d. for the last 12-month period].  
[OAC rule 3745-77-07(C)(1) and PTI P0117977]
- (2) The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow for any visible particulate emissions from the stack(s) serving each emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal emissions;
  - c. if the emissions are not representative of normal emissions, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.  
[OAC rule 3745-77-07(C)(1) and PTI P0117977]
- (3) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or the use of new materials, that would cause the emissions of any toxic air



contaminant to increase above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the actual VOC emissions, in tons, for emissions units P136, P137, and P140 combined. The reports shall be submitted by January 31 of each year and shall cover each rolling 12-month period in the previous calendar year [See d)(1)e.]. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous six-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

f) Testing Requirements

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

a. Emission Limitation:

8.26 lbs of VOC/hour

Applicable Compliance Method

The hourly allowable VOC emission limitation represents the potential to emit and is based on a maximum hourly rubber throughput of 20,900 lbs/hour (Silica Stock), an emission factor of  $3.95 \times 10^{-4}$  lb of VOC/lb of rubber produced (as determined by an April 2002 stack test).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation using Methods 1-4 and 18, 25, and/or 25A of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

b. Emission Limitation:

60.00 tons of VOC/rolling 12-month period for emissions units P136, P137, and P140, combined



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Applicable Compliance Method

Compliance shall be based on the recordkeeping requirements specified in section d)(1)e.

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

c. Emission Limitations:

0.17 lb of particulate matter 10 microns or less in size (PM<sub>10</sub>)/hour; 0.74 ton of PM<sub>10</sub>/year

Applicable Compliance Method

The hourly allowable PM<sub>10</sub> emission limitation represents the potential to emit and is based on a maximum hourly rubber throughput of 21,670 lbs/hour (Standard Final Stock) and an emission factor of  $7.70 \times 10^{-6}$  lb of PM\*/lb of rubber produced. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M.

The annual allowable PM<sub>10</sub> limitation was developed by multiplying the hourly limitation by 8760 hours/year, then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

\* This emission factor was generated from a stack test performed in 1998. All PM is assumed to be PM<sub>10</sub>.

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

d. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six-minute average

Applicable Compliance Method

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

[OAC rule 3745-77-07(C)(1) and PTI P0117977]

g) Miscellaneous Requirements

(1) None.



**8. P137, Banbury Mixer (Master/Final/Silica)**

**Operations, Property and/or Equipment Description:**

Banbury Mixer (Master/Final/Silica)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., d)(3), d)(4), d)(5), d)(6), and e)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI P0112973 issued 2/27/2013)	0.25 lb of particulate matter 10 microns or less in size (PM10)/hour  1.10 tons of PM10/year  Visible PE shall not exceed 5% opacity as a six-minute average  12.44 lbs of volatile organic compounds (VOC)/hour  60.00 tons of VOC/rolling 12-month period for emissions units P136, P137, and P140 combined (see b)(2)a.)  Control requirements (see b)(2)b.)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-17-11(B)	See b)(2)e.
e.	OAC rule 3745-17-07(A)	See b)(2)f.
f.	40 CFR Part 63, Subpart XXXX	See b)(2)g.
g.	ORC rule 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(3)



(2) Additional Terms and Conditions

- a. The annual limitation represents the potential emissions from P136, P137, and P140 based on inherent physical limitations associated with the production of mixed rubber. These emissions units are used to produce mixed rubber (both regular and silica rubber) which is utilized in subsequent manufacturing processes for the production of pneumatic tires. The production of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, volatile organic emissions are physically limited to 60.00 tons per rolling 12-month period from P136, P137, and P140.
- b. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:
  - i. the use of a baghouse control system with 95% removal efficiency.

All emissions of particulate matter from the dust collector stack are PM<sub>10</sub>.

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

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

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12/01/06 will no longer apply.

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



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

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

- e. The uncontrolled mass rate of particulate emissions from each unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 does not apply because the facility is located in Hancock County.
- f. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- g. Pursuant to 40 CFR 63.5982(B)(4), there are no emission limitations or other requirements for "rubber processing" affected sources of 40 CFR Part 63 Subpart XXXX.
- h. The hourly VOC limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

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

- a. This emissions unit shall be vented to a dust collection system capable of achieving 95% removal efficiency for filterable particulate emissions. [OAC rule 3745-77-07(A)(1) and PTI P0112973]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:

- a. Identification of each type of mixing operation performed (master mixing, final mixing, 2<sup>nd</sup> pass silica mixing, or 3<sup>rd</sup> pass silica mixing);
- b. Amount of rubber, in pounds, mixed for each type of mixing operation;
- c. Calculated VOC emissions from each type of mixing operation using the following equation:

$$\text{lbs of VOC emissions} = (\text{lbs of rubber mixed}) \times (\text{VOC emission factor* in lbs of VOC/lb of rubber})$$



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\* VOC emission factors from AP-42, Section 4.12 and from stack testing performed by the company shall be used in the emission calculation.

- d. Total VOC emissions from all mixing operations, in pounds [summation of d)(1)c. for all types of mixing operations]; and
  - e. The rolling 12-month summation of VOC emissions from all mixing operations [summation of d)(1)d. for the last 12-month period].  
[OAC rule 3745-77-07(C)(1) and PTI P0112973]
- (2) The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow for any visible particulate emissions from the stack(s) serving each emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal emissions;
  - c. if the emissions are not representative of normal emissions, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.  
[OAC rule 3745-77-07(C)(1) and PTI P0112973]
- (3) The PTI application for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute," ORC 3704.03(F), was applied for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the PTI application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using the SCREEN3 air dispersion model. The predicted 1-hour maximum ground-level concentration result from the SCREEN3 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 air compound emitted from the emissions unit (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 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 10 to adjust the standard from the working population to the general public (TLV/10).

c. This standard is then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the MAGLC:

$$TLV/10 \times 8/24 \times 5/7 = 4 TLV/(24)(7) = MAGLC$$

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 contaminants:

Pollutant: MIBK

TLV (mg/m<sup>3</sup>): 204.83

Maximum Hourly Emission Rate (lbs/hour): 0.38

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 19.45

MAGLC (ug/m<sup>3</sup>): 4876.90

The permittee has demonstrated that emissions of MIBK are calculated to be less than 80% of the MAGLC. Any new raw material or processing agent shall not be applied without evaluating each component air toxic contaminant in accordance with the Toxic Air Contaminant Statute.

[PTI P0112973]

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters 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 used to determine 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 materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01 that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation where compliance with the Toxic Air Contaminant Statute has been documented. If the change(s) meet(s) the definition of a modification, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, as described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration, and may require the permittee to submit a permit application for the increased emissions.

[PTI P0112973]

(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:

- a. a description of the parameters 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 MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute;
- c. a copy of the computer model run(s) that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the Toxic Air Contaminant Statute 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 and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[PTI P0112973]

(6) The permittee shall maintain records of any change made to a parameter applied in the dispersion model used to demonstrate compliance with the Toxic Air Contaminant Statute through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason for the change and if the change would increase the ground-level concentration.

[PTI P0112973]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the actual VOC emissions, in tons, for emissions units P136, P137, and P140 combined. The reports shall be submitted by January 31 of each year and shall cover each rolling 12-month period in the previous calendar year [see d)(1)e.]. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC rule 3745-77-07(C)(1) and PTI P0112973]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous six-month period. The reports shall be submitted electronically through Ohio EPA Air Services.  
[OAC rule 3745-77-07(C)(1) and PTI P0112973]
  - (3) The permittee shall include any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the Toxic Air Contaminant Statute through the predicted 1-hour maximum ground-level concentration in the quarterly deviation reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.  
[PTI P0112973]
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation  
12.44 lbs of VOC/hour  
  
Applicable Compliance Method  
The hourly allowable VOC emission limitation represents the potential to emit and is based on a maximum hourly rubber throughput of 5950 lbs/hour and an emission factor of  $2.09 \times 10^{-3}$  lb of VOC/lb of rubber produced (as determined by an April 2002 stack test).  
  
If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation using Methods 18, 25, and/or 25A of 40 CFR Part 60.  
[OAC rule 3745-77-07(C)(1) and PTI P0112973]
    - b. Emission Limitation  
60.00 tons of VOC/rolling 12-month period for emissions units P136, P137, and P140 combined  
  
Applicable Compliance Method  
Compliance shall be based on the recordkeeping requirements specified in section d)(1)e.  
[OAC rule 3745-77-07(C)(1) and PTI P0112973]
    - c. Emission Limitation  
0.25 lb of particulate matter 10 microns or less in size (PM10)/hour; 1.10 tons of PM10/year



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Applicable Compliance Method

The hourly allowable PM10 emission limitation represents the potential to emit and is based on a maximum hourly rubber throughput of 13,750 lbs/hour (Standard Master rubber), an emission factor of  $4.02 \times 10^{-4}$  lb of PM10\*/lb of rubber produced, an estimate that 90% of emissions are released during the master pass, and a 95% control efficiency for the baghouse. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760 hours/year, then dividing by 2000.

Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be demonstrated.

\* Emission factor from AP-42 Section 4.12 (Draft/2008) based on Compound #2  
[OAC rule 3745-77-07(C)(1) and PTI P0112973]

d. Emission Limitation

Visible PE shall not exceed 5 percent opacity as a six-minute average

Applicable Compliance Method

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

[OAC rule 3745-77-07(C)(1) and PTI P0112973]

g) Miscellaneous Requirements

(1) None.

**9. P140, Banbury Mixer (Final/Silica)**

**Operations, Property and/or Equipment Description:**

Banbury Mixer (Final/Silica)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g. and d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI P0115524 issued 10/23/2013)	0.17 lb of particulate matter 10 microns or less in size (PM10)/hour  0.74 ton of PM10/year  Visible PE shall not exceed 5% opacity as a six-minute average  8.74 lbs of volatile organic compounds (VOC)/hour  60.00 tons of VOC/rolling 12-month period from emissions units P136, P137, and P140 combined (see b(2)a.)  Control requirements (see c)(1))
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	ORC rule 3704.03(T)	See b)(2)e.
e.	OAC rule 3745-17-11(B)	See b)(2)f.
f.	OAC rule 3745-17-07(A)	See b)(2)g.
g.	40 CFR Part 63, Subpart XXXX	See b)(2)h.
h.	ORC rule 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(3)

(2) Additional Terms and Conditions

- a. The annual limitation represents the potential emissions from P136, P137, and P140 based on inherent physical limitations associated with the production of mixed rubber. These emissions units are used to produce mixed rubber (both regular and silica rubber) which is utilized in subsequent manufacturing processes for the production of pneumatic tires. The production of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, VOC emissions are physically limited to 60.00 tons per rolling 12-month period from P136, P137, and P140.
- b. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which require control equipment:
  - i. 0.17 lb of PM<sub>10</sub>/hour;
  - ii. 0.74 ton of PM<sub>10</sub>/year;
  - iii. 8.74 lbs of VOC/hour; and
  - iv. 60.00 tons of VOC per rolling 12-month period from emissions units P136, P137, and P140 combined.

All emissions of particulate matter from the dust collector stack are PM<sub>10</sub>.

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

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

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



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approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12/01/06 will no longer apply.

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

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

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

- e. The BAT requirement under ORC rule 3704.03(T) has been determined to be compliance with the rolling 12-month emission limitation established under OAC rule 3745-31-05(F).
- f. The uncontrolled mass rate of particulate emissions from each unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 does not apply because the facility is located in Hancock County.
- g. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- h. Pursuant to 40 CFR 63.5982(B)(4), there are no emission limitations or other requirements for "rubber processing" affected sources of 40 CFR Part 63 Subpart XXXX.
- i. The hourly VOC limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) **Operational Restrictions**

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [See b)(2)b.):
  - a. This emissions unit shall be vented to a dust collection system capable of achieving 95% removal efficiency for filterable particulate emissions. [OAC rule 3745-77-07(A)(1) and PTI P0115524]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:



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- a. Identification of each type of mixing operation performed (master mixing, final mixing, 2<sup>nd</sup> pass silica mixing, or 3<sup>rd</sup> pass silica mixing);
  - b. Amount of rubber, in pounds, mixed for each type of mixing operation;
  - c. Calculated VOC emissions from each type of mixing operation using the following equation:  
  
$$\text{lbs of VOC emissions} = (\text{lbs of rubber mixed}) \times (\text{VOC emission factor* in lbs of VOC/lb of rubber})$$
  
  
\* VOC emission factors from AP-42, Section 4.12 and from stack testing performed by the company shall be used in the emission calculation.
  - d. Total VOC emissions from all mixing operations, in pounds [summation of d)(1)c. for all types of mixing operations]; and
  - e. The rolling 12-month summation of VOC emissions from all mixing operations [summation of d)(1)d. for the last 12-month period].  
[OAC rule 3745-77-07(C)(1) and PTI P0115524]
- (2) The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow for any visible particulate emissions from the stack(s) serving each emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal emissions;
  - c. if the emissions are not representative of normal emissions, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.  
[OAC rule 3745-77-07(C)(1) and PTI P0115524]
- (3) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.  
[OAC rule 3745-77-07(C)(1) and PTI P0115524]



e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the actual VOC emissions, in tons, for emissions units P136, P137, and P140 combined. The reports shall be submitted by January 31 of each year and shall cover each rolling 12-month period in the previous calendar year (see d)(1)e.). The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC rule 3745-77-07(C)(1) and PTI P0115524]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous six-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC rule 3745-77-07(C)(1) and PTI P0115524]

f) Testing Requirements

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

a. Emission Limitation

8.74 lbs of VOC/hour

Applicable Compliance Method

The hourly allowable VOC emission limitation represents the potential to emit and is based on a maximum hourly rubber throughput of 20,900 lbs/hour (Silica Stock), an emission factor of  $2.09 \times 10^{-3}$  lb of VOC/lb of rubber produced (as determined by an April 2002 stack test), and an estimate that the final pass accounts for 20% of the emission factor.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation using Methods 1-4 and 18, 25, and/or 25A of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0115524]

b. Emission Limitation

60.00 tons of VOC/rolling 12-month period for emissions units P136, P137, and P140, combined

Applicable Compliance Method

Compliance shall be based on the recordkeeping requirements specified in section d)(1)e.

[OAC rule 3745-77-07(C)(1) and PTI P0115524]



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c. Emission Limitation

0.17 lb of particulate matter 10 microns or less in size (PM10)/hour; 0.74 ton of PM10/year

Applicable Compliance Method

The hourly allowable PM10 emission limitation represents the potential to emit and is based on a maximum hourly rubber throughput of 21,670 lbs/hour (Standard Final Stock) and an emission factor of  $7.70 \times 10^{-6}$  lb of PM\*/lb of rubber produced. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760 hours/year, then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

\* This emission factor was generated from a stack test performed in 1998. All PM is assumed to be PM10.

[OAC rule 3745-77-07(C)(1) and PTI P0115524]

d. Emission Limitation

Visible PE shall not exceed 5% opacity as a six-minute average

Applicable Compliance Method

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

[OAC rule 3745-77-07(C)(1) and PTI P0115524]

g) Miscellaneous Requirements

(1) None.



**10. P147, Twin-Two Calender Line**

**Operations, Property and/or Equipment Description:**

Twin-Two Calender Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-13915 issued 11/12/2002)	1.42 lbs organic compounds (OC)/hour; 6.22 tons OC/year

(2) Additional Terms and Conditions

a. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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



a. Emission Limitation:

1.42 lbs OC/hour; 6.22 tons OC/year

Applicable Compliance Method:

The hourly OC emission limitation represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 5,127 lbs/hour and the following emission factors:

Milling:  $1.10 \times 10^{-4}$  lb of OC/lb of rubber milled (AP-42 Section 4.12 [6/99]) x 2 mills

Calendering:  $5.59 \times 10^{-5}$  lb of OC/lb of rubber calendered (AP-42 Section 4.12 [6/99])

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13915]

g) Miscellaneous Requirements

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

\* Only compounds/pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

[PTI 03-13915]



**11. P150, Cold Feed Pin Barrel Tread Line**

**Operations, Property and/or Equipment Description:**

Cold Feed Pin Barrel Tread Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-16093 issued 04/15/2004)	1.31 lbs organic compounds (OC)/hour; 5.74 tons OC/year

(2) Additional Terms and Conditions

a. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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



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a. Emission Limitations:

1.31 lbs OC/hour; 5.74 tons OC/year

b. Applicable Compliance Method

The hourly OC emission limitation represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 14,544 lbs/hour and an emission factor of  $9.0 \times 10^{-5}$  based on an April 2002 stack test.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-16093]

g) Miscellaneous Requirements

(1) None.



**12. P200, Z-Calender with mill and extruder**

**Operations, Property and/or Equipment Description:**

Z Calender with mill and extruder

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-31-05(A)(3), as effective 11/30/01 (PTI P0106694 issued 08/10/2010)	2.10 lbs volatile organic compounds VOC)/hr, 9.20 tons VOC/yr  See b)(2)a.
b.	OAC 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 63 Subpart XXXX	See b)(2)c.
d.	OAC 3745-21-09(X)	See b)(2)d.

(2) Additional Terms and Conditions

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

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



The PTE for this emissions unit is 9.20 tons of VOC per year based on a maximum hourly throughput of 11,997 lbs of rubber, a maximum operating schedule of 8760 hours per year, and the following emission factors:

<b>Process</b>	<b>Emission Factor (lb of VOC/lb of rubber processed)</b>	<b>Emission Factor Citation</b>
Calendering	0.0000559	P-42 Section 4.12, Table 4.12-3 (11/08 Draft)
Milling	0.000110	P-42 Section 4.12, Table 4.12-3 (11/08 Draft)
Extrusion	0.00000937	P-42 4.12-11 (06/99 Draft)

- c. This emissions unit does not involve operations which are considered affected sources covered by 40 CFR Part 63, Subpart XXXX. Emissions unit P200 involves calendering, extruding, and milling operations. The calendering operations do not use solvent and the extruding operations do not use solvent or cement and, as such, in accordance with 40 CFR 63.5982(b)(1), these operations are not considered affected sources that are covered by 40 CFR Part 63, Subpart XXXX. Additionally, the milling operations associated with this emissions unit are not considered affected sources in accordance with 40 CFR 63.5982(b)(4).
- d. This emissions unit is not subject to any requirements under OAC rule 3745-21-09(X).
- e. The hourly VOC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Modeling to demonstrate compliance with the "Air Toxic Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[PTI P0106694]



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e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. Emission Limitations

2.10 lbs VOC/hour; 9.20 tons VOC/year

Applicable Compliance Method

The hourly emission limitation for this emissions unit was based on a maximum hourly throughput of 11,997 lbs of rubber, and each of the emission factors as in b)(2)b.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual emission limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI P0106694]

g) Miscellaneous Requirements

(1) None.



**13. R012, Tread Marking Operation**

**Operations, Property and/or Equipment Description:**

Tread Marking Operation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008 (PTI P0119867 issued 12/09/2015)	The Best Available Technology (BAT) requirements for this emissions unit have been determined to be equivalent to the requirements in 40 CFR Part 63, Subpart XXXX.  See b)(2)a. below.  [All the HAPs employed in this emissions unit are assumed to be VOCs.]
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)b.
c.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-63.6014)  [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing tire production affected source – ink and finish operation subject to the emission limitations and control requirements specified in this section.]	Table 1 to Subpart XXXX:  Option 1 – HAP constituent option; or Option 2 – production-based option  See b)(2)c.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR 63.1-15	Table 17 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provision to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. See Section B. Facility-Wide Terms and Conditions.

c) Operational Restrictions

- (1) See Section B. Facility-Wide Terms and Conditions. [OAC 3745-77-07(A)(1) and PTI P0119867]

d) Monitoring and/or Recordkeeping Requirements

- (1) See Section B. Facility-Wide Terms and Conditions. [OAC 3745-77-07(C)(1) and PTI P0119867]

e) Reporting Requirements

- (1) See Section B. Facility-Wide Terms and Conditions. [OAC 3745-77-07(C)(1) and PTI P0119867]

f) Testing Requirements

- (1) See Section B. Facility-Wide Terms and Conditions. [OAC 3745-77-07(C)(1) and PTI P0119867]

g) Miscellaneous Requirements

- (1) None.



**14. Emissions Unit Group -Tire Inspection/Repair Stations: P216 and P217**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P216	Tire Inspection and Repair Station #1
P217	Tire Inspection and Repair Station #2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014)  [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - ink and finish operations' subject to the emission limitations and control requirements specified in this section.]	Table 1 to Subpart XXXX:  Option 1 - HAP constituent option; or Option 2 - production-based option  See b)(2)a.
b.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. See Section B. Facility-Wide Terms and Conditions.

c) Operational Restrictions

(1) See Section B. Facility-Wide Terms and Conditions. [OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) See Section B. Facility-Wide Terms and Conditions. [OAC 3745-77-07(C)(1)]



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- e) Reporting Requirements
  - (1) See Section B. Facility-Wide Terms and Conditions.  
[OAC 3745-77-07(C)(1)]
- f) Testing Requirements
  - (1) See Section B. Facility-Wide Terms and Conditions.  
[OAC 3745-77-07(C)(1)]
- g) Miscellaneous Requirements
  - (1) None.