



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

9/21/2016

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0332010003
 Permit Number: P0120951
 Permit Type: Initial Installation
 County: Hancock

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Courier. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
 Ohio EPA-NWDO; Michigan; Indiana; Canada

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Cooper Tire & Rubber Company (Cooper Tire) operates a tire manufacturing facility in Findlay, Ohio. Cooper Tire is proposing to install a new tread line, including extrusion (P363) and cementing (K013) operations. There are two existing tread lines at the facility, also including extrusion (P150 and P299) and cementing operations (K002 and K008, respectively). The existing cementing operations have synthetic minor limits of 30 tons VOC/rolling 12-month period for K002 and 21 tons VOC/rolling 12-month period, in addition to 6.42 tons VOC/year for clean-up operations each. Cooper Tire is proposing a single rolling limit of 40 tons VOC/rolling 12-month period for all three cementing operations combined, and a combined limit of 6 tons VOC/rolling 12-month period for clean-up solvent, thus lowering overall VOC emissions while installing a new tread line at the facility.

3. Facility Emissions and Attainment Status:

Cooper Tire is located in Hancock County and is classified as a minor source for Prevention of Significant Deterioration (PSD) purposes because existing Volatile Organic Compound (VOC) emissions are less than 250 tons per year. Hancock County is designated attainment for all criteria pollutants.

4. Source Emissions:

A Chapter 31 modification for K002 (PTI # 03-17298, issued 08-28-08) established a rolling emission limitation for VOC of 30 tons/rolling 12-month period. The initial installation PTI for K008 (PTI # 03-16310, issued 06-02-05) established a rolling emission limitation for VOC of 21 tons/rolling 12-month period. In addition, each PTI established an annual limit of 6.42 tons VOC for clean-up operations.

The changes proposed by Cooper Tire is summarized in the table below.

DAPC Emissions Unit	Company Description	Old Limit	New Limit
K002 (existing EU)	Manual/Automatic Tread End Cement Station	<u>Tread Cement</u> 18 lbs VOC/hr 30 tons VOC/rolling 12-month period	46.0 tons of Volatile Organic Compounds (VOCs) per rolling 12-month period from emissions units K002, K008, and K013 combined, for tread cement and clean-up solvent usage.
		<u>Solvent Clean-up</u> 1070 lbs VOC/hr 6.42 tons VOC/yr	
K008 (existing EU)	Manual/Automatic Tread End Cement Station	<u>Tread Cement</u> 18 lbs VOC/hr 21 tons VOC/rolling 12-month period	



		<u>Solvent Clean-up</u> 35.2 lbs VOC/day 6.42 tons VOC/yr	
K013 (new EU)	Quadraplex Manual/Automatic Tread End Cement Station	N/A	
P363 (new EU) PTI P0121463	Quadraplex Extrusion Line	N/A	0.56 tons volatile organic compound (VOC) per month averaged over a 12-month rolling period

The net change in allowable emissions is as follows:

Emissions Unit	Net Change (TPY VOC)
P363 (P0121463)	+ 6.60
K002, K008, and K013	- 17.84
Total	- 11.24

Also, particulate emissions that resulted from the spraying of the tread end cement will be eliminated by hand/brush application for all three lines.

5. Conclusion:

With the processing of this permit, all three cementing lines will have a synthetic minor VOC limit of 46 tons/rolling 12-month period for tread cement and clean-up solvent usage. This permit will allow for the installation of a new tread end cementing line, with quadraplex extrusion to be permitted under PTI P0121463. The net change in allowable VOC emissions as a result of the processing of this permit and PTI P0121463 is -11.24 tons VOC/year. Also, particulate emissions that result from the spraying of the tread end cement will be eliminated by hand/brush application.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>46.0</u>

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Initial Installation

The Cooper Tire Company - Findlay

701 Lima Ave., Findlay, OH 45840-0550

ID#:P0120951

Date of Action: 9/21/2016

Permit Desc:PTI to establish a new synthetic minor limit for three tread end cement stations (two existing and one new)..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
The Cooper Tire Company - Findlay**

Facility ID:	0332010003
Permit Number:	P0120951
Permit Type:	Initial Installation
Issued:	9/21/2016
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
The Cooper Tire Company - Findlay

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	15
1. Emissions Unit Group -Tread End Cement Stations: K002, K008, and K013	16



Draft Permit-to-Install
The Cooper Tire Company - Findlay
Permit Number: P0120951
Facility ID: 0332010003
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0332010003
Facility Description: Tires and Inner Tubes
Application Number(s): A0056087
Permit Number: P0120951
Permit Description: PTI to establish a new synthetic minor limit for three tread end cement stations (two existing and one new).
Permit Type: Initial Installation
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/21/2016
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install
 The Cooper Tire Company - Findlay
Permit Number: P0120951
Facility ID: 0332010003
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120951

Permit Description: PTI to establish a new synthetic minor limit for three tread end cement stations (two existing and one new).

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

Group Name: Tread End Cement Stations

Emissions Unit ID:	K002
Company Equipment ID:	K002
Superseded Permit Number:	03-17298
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	K008
Superseded Permit Number:	03-16310
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K013
Company Equipment ID:	Quadraplex Tread Cement Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
The Cooper Tire Company - Findlay
Permit Number: P0120951
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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

- 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.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

local air agency, 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible 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 ORC section 3704.08.
 - (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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



Draft Permit-to-Install
The Cooper Tire Company - Findlay
Permit Number: P0120951
Facility ID: 0332010003
Effective Date: To be entered upon final issuance

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, K013, 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:
 - d) 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).
 - e) 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.



Draft Permit-to-Install
The Cooper Tire Company - Findlay
Permit Number: P0120951
Facility ID: 0332010003

Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install
The Cooper Tire Company - Findlay
Permit Number: P0120951
Facility ID: 0332010003
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Tread End Cement Stations: K002, K008, and K013

EU ID	Operations, Property and/or Equipment Description
K002	Manual/Automatic Tread End Cement Station (Modification)
K008	Automatic/Manual Tread End Cementer (Modification)
K013	Quadraplex Tread Cement 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(D)	46.0 tons of volatile organic compounds (VOC) per rolling, 12-month period from emissions units K002, K008, and K013, combined, for tread cement and clean-up solvent usage. See b)(2)a.
b.	ORC rule 3704.03(T) [Best Available Technology (BAT) for pollutants greater than 10 tons per year]	See b)(2)b.
c.	OAC rule 3745-21-09(X)(1)	See b)(2)c.
d.	40 CFR 60.540 et seq. (NSPS Subpart BBB)	For tread end cementing operation: 10 grams (0.022 lb) of VOC per tire cemented (monthly average) [40 CFR 60.542(a)(3)] See d)(2) and d)(3), and f)(1) through f)(6).
e.	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']	Table 1 to Subpart XXXX: Option 1 - HAP constituent option; or Option 2 - production-based option See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	subject to the emission limitations /control requirements specified in this section.]	
f.	40 CFR 63.1-15 (40 CFR 63.6013)	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.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitation for purposes of avoiding Prevention of Significant Deterioration (PSD).
 - i. Emissions of VOC from tread end cementing and clean-up operations shall not exceed 46.00 tons per rolling, 12-month period for emissions units K002, K008, and K013, combined, based on a tread end cement usage and VOC content restriction [See section c)(1)] and a solvent usage restriction [See c)(2)].
 - ii. Rolling emission limitations were established in Permits to Install (PTIs) #03-17298 (issued on 8/28/08) for K002, and 03-16310 (issued 6/02/05) for K008, and as such, rolling VOC emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.
- b. The Best Available Technology (BAT) requirement under ORC rule 3704.03(T) has been determined to be compliance with the rolling, 12-month VOC emission limitation established under OAC rule 3745-31-05(D).
- c. These emissions units are exempt from the requirements of OAC rule 3745-21-09(X)(1), pursuant to OAC rule 3745-21-09(X)(2)(d).
- d. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for these emissions units (See Sections B.2 through B.9).

c) Operational Restrictions

- (1) The maximum annual tread end cement usage for emissions units K002, K008, and K013, combined, shall not exceed 13,500 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.

- (2) The maximum annual clean-up solvent usage for emissions units K002, K008, and K013, combined, shall not exceed 1,900 gallons per year, based upon a rolling, 12-month summation of the gallon usage.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for emissions units K002, K008, and K013, combined:
 - a. the company name or identification for each coating (cement) and clean-up 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)(1)b times d)(1)c];
 - e. the total VOC emission rate from all coating materials employed [summation of d)(1)d], in pounds or tons;
 - f. the volume, in gallons, of each cleanup material employed;
 - g. the VOC content, in pounds per gallon, of each cleanup material employed;
 - h. the total VOC emission rate, in pounds or tons, for each cleanup material employed [d)(1)f times d)(1)g];
 - i. the total VOC emission rate from all cleanup materials employed [summation of d)(1)h], in pounds or tons
 - j. the total VOC emission rate from all coating (cement) and clean-up materials employed [d)(1)e. plus d)(1)i.]
 - k. the rolling, 12-month VOC emission rates [rolling 12-month total of d)(1)j.], in tons.
 - (2) 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.
 - (3) 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.
- 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)d. [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.

- (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.

- (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 clean-up usage restriction of c)(2); and
 - d. any exceedances of the rolling, 12-month VOC limitation specified in b)(1)a.

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.

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.

- (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_i DC_i WO_i 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

- (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): $N = G$
- (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).
- (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 .
- (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.
- (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:

46.00 tons VOC per rolling, 12-month period, from emissions units K002, K008, and K013 combined, for tread cement and clean-up solvent usage

Applicable Compliance Method:

Compliance shall be based on the record keeping requirement as specified in d)(1).

b. Emission Limitation:

10 grams (0.022 lb) of VOC per tire cemented (monthly average) for tread end cementing operation

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(2) and d)(3), and the testing requirements in f)(1) through f)(6).

g) Miscellaneous Requirements

None.