

Facility ID: 1677011064 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1677011064 Emissions Unit ID: P904 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Mill "E" - 60" two roll mill	PTI #16-1546	0.5 lb/hr particulate matter 35.0 lbs/hr organic compounds (See Additional Terms and Conditions A.2.a.)
	OAC 3745-17-07(A)	20% opacity as a six-minute average for stack emissions
	OAC 3745-17-07(B)	20% opacity as a three-minute average for fugitive emissions
	OAC 3745-17-08 OAC 3745-17-11	

2. Additional Terms and Conditions

- (a) The emissions of organic compounds (OC) from Mill "E" shall not exceed 10.5 tons per year based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of OC (Tons)
1	0.9
1-2	1.8
1-3	2.6
1-4	3.5
1-5	4.4
1-6	5.3
1-7	6.1
1-8	7.0
1-9	7.9
1-10	8.8
1-11	9.6
1-12	10.5

After the first 12 calendar months of operation, compliance with the annual emission limitations for OC shall be based upon a rolling, 12-month summation of the monthly emissions. The permittee shall employ equipment (e.g., hoods) to capture and vent particulate emissions to the baghouse/fabric filter.

B. Operational Restrictions

1. The maximum rate of the high VOC compound shall not exceed 142.3 pounds per hour.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:

- a. The amount of OC emitted.
 - b. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the OC emissions.
 - c. The total pounds of compound produced.
 - d. The total pounds of the high VOC compound produced.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative emissions of OC for each calendar month.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for OC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. The deviation reports shall be submitted to the Akron Regional Air Quality Management District within 45 days of the deviation.

E. Testing Requirements

- 1. Compliance with the particulate emission limitation shall be determined by either using the particulate emissions factor of 0.5 pound(s) of particulate emissions per hour (Air Pollution Engineering Manual, Second Edition, page 376) or by performing an emission test in accordance with OAC rule 3745-17-03(B)(10).
- 2. Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).
- 3. Compliance with the visible emission limitations in OAC rule 3745-17-07(B)(1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(3).
- 4. Compliance with the allowable emissions of organic compounds, in lbs/hr, shall be determined using the following equation. The emission factors were developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

$$[0.246 + (14/1,000,000)]X = \text{lbs/hr of OC}$$

X = maximum pounds of high VOC compound

Should the process and/or equation for allowable OC emissions change, the permittee shall reconfirm the OC emission factors and submit appropriate documentation to the Akron RAQMD.

- 5. Compliance with the allowable annual emissions of organic compounds, in tons/year, shall be determined using the following equation. The emission factors were developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

$$[0.246(X) + (14/1,000,000)(Y)]/2000 = \text{tons of OC per year}$$

X = total pounds of the high VOC compound per year

Y = total pounds of compound per year

Should the process and/or equation for allowable OC emissions change, the permittee shall reconfirm the OC emission factors and submit appropriate documentation to the Akron RAQMD.

- 6. As an alternative to the equation in E.4, emission tests may be required in the future pursuant to OAC rule 3745-21-10.

F. Miscellaneous Requirements

- 1. None

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Part II - Special Terms and Conditions

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- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Banbury "F" - closed chamber banbury mixer PTI #16-1546		2.0 lb/hr particulate matter 1.0 lb/hr organic compounds (See Additional Terms and Conditions A.2.a.)
	OAC 3745-17-07(A)	20% opacity as a six-minute average for stack emissions
	OAC 3745-17-07(B)	20% opacity as a three-minute average for fugitive emissions
	OAC 3745-17-08	
	OAC 3745-17-11	

2. **Additional Terms and Conditions**

- (a) The permittee shall employ equipment (e.g., hoods) to capture and vent particulate emissions to the baghouse/fabric filter.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. None

D. **Reporting Requirements**

1. None

E. **Testing Requirements**

1. Compliance with the particulate emission limitation shall be determined by either using the particulate emissions factor of 0.5 pound(s) of particulate emissions per hour (Air Pollution Engineering Manual, Second Edition, page 376) or by performing an emission test in accordance with OAC rule 3745-17-03(B)(10).
2. Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(1).
3. Compliance with the visible emission limitations in OAC rule 3745-17-07(B)(1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(3).
4. Compliance with the allowable emissions of organic compounds shall be determined using the following equation. The emission factor was developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

$$(7.2/1,000,000)(X) = \text{lbs/hr of OC}$$

X = maximum pounds of compound per hour

Should the process and/or equation for allowable OC emissions change, the permittee shall reconfirm the OC emission factors and submit appropriate documentation to the Akron RAQMD.
5. As an alternative to the equation in E.4, emission tests may be required in the future pursuant to OAC rule 3745-21-10.

F. **Miscellaneous Requirements**

1. None