

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: P901 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 A - 60 inch two roll mill	OAC rule 3745-31-05(A)(3) (PTI 16-1518)	Particulate emissions shall not exceed 1.0 lb/hr.
		Volatile organic compounds (VOC) emissions shall not exceed 2.8 lbs/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08	See A.2.a below.
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-21-07(G)	See B.1 below.

2. **Additional Terms and Conditions**
  - (a) The permittee shall employ equipment (e.g., hoods) to capture and vent particulate emissions to the cyclone and fabric filter. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

**B. Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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

1. None

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitation:  
 1.0 lb/hr particulate emissions  
  
 Applicable Compliance Method:  
  
 Compliance with the particulate emission limitation shall be determined by either using the particulate emission factor of 0.5 pound 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).

Emission Limitation:

2.8 lbs/hr of VOC

Applicable Compliance Method:

Compliance with the allowable emissions of organic compounds 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.

$[0.014 + (14/1,000,000)]X = \text{lbs/hr of OC}$

where:

X = maximum pounds of high VOC 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.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677011064 Emissions Unit ID: P902 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 B - 84 inch two roll mill	OAC rule 3745-31-05(A)(3) (PTI 16-1518)	Particulate emissions shall not exceed 0.5 lb/hr.
	OAC rule 3745-17-07(A)	Volatile organic compounds (VOC) emissions shall not exceed 1.0 lb/hr.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-08	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-11	See A.2.a below.

OAC rule 3745-21-07(G)

See B.1 below.

**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.  
The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

**B. Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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

1. None

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.5 lb/hr particulate emissions

Applicable Compliance Method:

Compliance with the particulate emission limitation shall be determined by either using the particulate emission factor of 0.5 pound 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).

Emission Limitation:

1.0 lb/hr of VOC

Applicable Compliance Method:

Compliance with the allowable emissions of organic compounds 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.

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

where:

X = maximum pounds of high VOC 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.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1677011064 Emissions Unit ID: P903 Issuance type: Final State Permit To Operate

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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>
Mill C - 84 inch two roll mill	OAC rule 3745-31-05(A)(3) (PTI 16-1518)	Particulate emissions shall not exceed 0.5 lb/hr.
		Volatile organic compounds (VOC) emissions shall not exceed 1.0 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08	See A.2.a below.
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-21-07(G)	See B.1 below.

**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. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

**B. Operational Restrictions**

- 1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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

- 1. None

**D. Reporting Requirements**

- 1. None

**E. Testing Requirements**

- 1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

0.5 lb/hr particulate emissions

Applicable Compliance Method:

Compliance with the particulate emission limitation shall be determined by either using the particulate emission factor of 0.5 pound 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).

Emission Limitation:

1.0 lb/hr of VOC

Applicable Compliance Method:

Compliance with the allowable emissions of organic compounds 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.

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

where:

X = maximum pounds of high VOC 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.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)  
Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

**F. Miscellaneous Requirements**

- 1. None

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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	OAC rule 3745-31-05(A)(3) (PTI 16-1546)	Particulate emissions shall not exceed 0.5 lb/hr.  Organic compound (OC) emissions shall not exceed 35.0 lbs/hr.
		See section A.2.a.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08	See A.2.b below.
	OAC rule 3745-17-11	See A.2.c below.
	OAC rule 3745-21-07(G)	See B.1 below.

**2. Additional Terms and Conditions**

- (a) The emissions of OC from Mill "E" shall not exceed 10.5 tons per year 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.  
The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

**B. Operational Restrictions**

- 1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

**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; and
  - 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 that identify all exceedances of the rolling, 12-month emission limitations for OC. The deviation reports shall be submitted to the Akron RAQMD within 45 days of the deviation.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

0.5 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance with the particulate emission limitation shall be determined by either using the particulate emission factor of 0.5 pound 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).

Emission Limitation:

35.0 lbs/hr of OC

Applicable Compliance Method:

Compliance with the allowable emissions of OC, 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.

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

where:

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.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

Emission Limitation:

10.5 tpy of OC

Applicable Compliance Method:

Compliance with the allowable annual emissions of OC, 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.

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

where:

X = total pounds of the high VOC compound per year; and

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.

**F. Miscellaneous Requirements**

- 1. None

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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>
Banbury "F" - closed chamber banbury mixer	OAC rule 3745-31-05(A)(3) (PTI 16-1546)	Particulate emissions shall not exceed 2.0 lbs/hr.
		Organic compound (OC) emissions shall not exceed 1.0 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08	See A.2.a below.
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-21-07(G)	See B.1 below.

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. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

**B. Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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

1. None

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

2.0 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance with the particulate emission limitation shall be determined by either using the particulate emission factor of 0.5 pound 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).

Emission Limitation:

1.0 lb/hr of OC

Applicable Compliance Method:

Compliance with the allowable emissions of OC 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.

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

where:

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.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

F. **Miscellaneous Requirements**

1. None