

Facility ID: 1677100024 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.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677100024 Emissions Unit ID: P001 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>
P001 - Banbury Unit,	OAC rule 3745-31-05(A)(3) PTI 16-02311 Issued 7/31/2003	1.25 pounds per hour of particulate emissions (PE), 5.5 tons per year of PE;
		1.18 pound per hour of organic compounds (OC), 5.2 tons per year of OC*.
		0.0052 pounds per hour of lead emissions, 0.03 tons per year;
		See 2.2.a.
		0.0052 pounds per hour of chromium emissions, 0.03 tons per year of PE;
	OAC rule 3745-21-07(G)	See 2.2.c.
	OAC rule 3745-17-07	See 2.2.d.
	OAC rule 3745-17-11	See 2.2.d.

**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 control equipment outlet shall achieve an emission rate of not greater than 0.030 grain per dry standard cubic foot of exhaust gases or there are no visible emissions whichever is less stringent.  
The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no hourly monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this limit.  
This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.  
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

**B. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range specified by the manufacturer while the emissions unit is in operation.

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

1. The Banbury will not be operated. Rather than monitoring Revlis proposes to:
  1. Inspect Equipment Routinely.
  2. Inspect Stock for visual emissions.
  3. Adopt preventative maintenance program.
2. The permittee shall collect the following data on a monthly basis:
  - The company identification for each adhesive/solvent and cleanup material employed;
  - The number of gallons of each adhesive/ solvent and cleanup material employed;

The organic compound and HAP content of each adhesive/solvent and cleanup material, in pounds per gallon;  
The total mass of rubber used during the monthly operating period; and,  
All data and calculations used to determine the monthly OC and HAP emission rates.

**D. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition 2.A of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

1.25 lbs/hr of PE and 5.5 tons per year of PE

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE emission limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99) table 4.12-4 of the US EPA AP-42 dated, June 8, 1999], of 0.0004 lb of PE per pound of rubber by the maximum raw material usage rate (lbs/hr) and by 1- the control efficiency.

Example calculation

PE emissions = (0.0004 lb PE/ lbs of rubber mixed) x (5,500 lbs / hr) x (1-.98)

Compliance with the annual PE emission limitation shall be assumed as long as compliance with the hourly PE emission limitation is maintained (the annual PE emission limitation was determined by multiplying the hourly PE allowable emission limitation by 8760, and then dividing by 2000).

Future testing may be required in accordance with the methods and procedures required by 40 CFR Part 60, Appendix A, Methods 1-5.

Emission Limitation:

0.030 grain / dscf or no visible emissions

Applicable Compliance Method:

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). Future testing may be required in accordance with the methods and procedures required by 40 CFR Part 60, Appendix A, Methods 1-5. Inspect stack visually, not method nine, we believe that method 22 may be more appropriate.

Emission Limitations:

1.18 lb of OC/hr and 5.2 tons per year of OC

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99)] of 0.000215 lb of OC/lb of rubber by the maximum raw material usage rate (lbs/hr).

Compliance with the annual OC emission limitation shall be assumed as long as compliance with the hourly OC emission limitation is maintained (the annual OC emission limitation was determined by multiplying the hourly OC emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall determine compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic 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.