

Facility ID: 1677150025 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: 1677150025 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>
specialty tire manufacturing - presses	OAC rule 3745-31-05 (PTI 16-1781)	192 lbs/day of volatile organic compounds (VOC) 35.0 tpy of VOC
	OAC rule 3745-21-09(X)	exempt (see B.1)

**2. Additional Terms and Conditions**

- (a) None

**B. Operational Restrictions**

1. The permittee shall only produce specialty tires for antique or other vehicles when produced on an irregular basis or with short production runs. These tires shall be produced on equipment separate from the lines used for passenger-type tires.

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

1. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
  - a. the types and number of tires produced;
  - b. the name and identification number of each coating and solvent employed;
  - c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents, of each coating and solvent employed;
  - d. the total number of gallons of each coating and solvent employed, excluding water and exempt solvents;
  - e. the number of days the emissions unit was in operation;
  - f. the calculated average daily VOC emission rate from tire curing, i.e., (a)\*(0.01 lb VOC/tire produced)(e), in pounds of VOC per day (average);
  - g. the calculated average daily VOC emission rate from all the coatings and solvents, i.e., the sum of (c)\*(d) for all coatings and solvents /(e), in pounds of VOC per day (average); and
  - h. the total VOC emission rate from tire production per day, i.e., (f) + (g), in pounds of VOC per day (average).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the average daily VOC emissions from all coatings and solvents exceeded 192 lbs/day, and the actual (average) daily VOC emission rate for each such month.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**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:

192.0 lbs/day of VOC  
35.0 tpy of VOC

## Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements of section C.1 of this permit.

The VOC emission factor for tire curing (0.01 lb VOC/ tire produced) is derived using the emission factor of 0.00029 pound of VOC per pound of rubber cured developed by the Rubber Manufacturers Association (RMA), submitted to USEPA, and issued as draft AP-42 emission factors. The factor of 0.01 pound of VOC/tire uses the average weight of the mix of tires produced and an average tire rubber content of 86%.

The VOC content of each coating and solvent shall be determined using USEPA Method 24 or formulation data.

F. **Miscellaneous Requirements**

1. This permit allows the use of the coatings and solvents specified by the permittee in the application for PTI number 16-1781. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the hexane and toluene emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and solvent formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:  
  
Pollutant: hexane  
  
TLV (mg/m3): 176  
Maximum Hourly Emission Rate (lbs/hr): 0.8295  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 144.6  
MAGLC (ug/m3): 4,190  
  
Pollutant: toluene  
  
TLV (mg/m3): 188  
Maximum Hourly Emission Rate (lbs/hr): 0.8295  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 144.6  
MAGLC (ug/m3): 4,476
2. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:
  - a. any changes in the composition of the coatings and cleanup materials, or the use of new coatings and cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
  - c. any change in the composition of the coatings and cleanup materials, or use of new coatings and cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
  - d. any change in the composition of the coatings and cleanup materials, or use of new coatings and cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
3. For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.