



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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P.O. Box 1049
Columbus, OH 43216-1049

7/16/2008

Certified Mail

Craig Busenbark
The Cooper Tire Company - Findlay
701 Lima Ave.
P.O. Box 550
Findlay, OH 45840-0550

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
Yes	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0332010003
Permit Number: 03-17298
Permit Type: Chapter 31 mod
County: Hancock

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 EPA Weekly Review and the local newspaper, The Courier. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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
122 South Front Street
Columbus, Ohio 43215

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 W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
The Cooper Tire Company - Findlay

Issue Date: 7/16/2008
Permit Number: 03-17298
Permit Type: Chapter 31 mod
Permit Description: Automatic/Manual Tread End Cement Station (modification)
Facility ID: 0332010003
Facility Location: The Cooper Tire Company - Findlay
701 Lima Ave.,
Findlay, OH 45840-0550
Facility Description: Tire Manufacturing (except Retreading)

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Julie McCarthy at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install
Permit Number: 03-17298
Facility ID: 0332010003

Effective Date: To be entered upon final issuance

Permit Strategy Write-Up

X Synthetic Minor Determination and/or 9 Netting Determination

Permit To Install: 03-17298

A. Source Description

Cooper Tire has proposed to modify emissions unit K002 by allowing for automatic cement application and employing a new tread end cement with a higher VOC content than previously permitted. K002 is currently permitted under PTI #03-13532 (issued 05/15/01) which includes federally enforceable terms and conditions limiting emissions of VOC to 20.81 tons per year. Cooper Tire is requesting to implement a tread end cement with a VOC content of 6.00 lbs/gallon and a maximum annual usage rate of 10,000 gallons. This will result in an annual VOC emission rate of 30.00 tons.

[Note: K002 was originally permitted under PTI #03-07035 (issued 07/14/93) which included federally enforceable terms and conditions limiting combined emissions from K001 and K002 to 49.56 tons of VOC per year. However, emissions unit K001 was never installed and Cooper applied for more stringent VOC limitations for emissions unit K002.]

B. Facility Emissions and Attainment Status

Cooper Tire is a major source for New Source Review (NSR) located in Hancock County. Hancock County is considered attainment for all criteria pollutants.

C. Source Emissions

Potential emissions from K002 equate to 125.26 tons of VOC per year, based on a maximum of 1300 treads cemented per hour and an emission rate of 10 grams of VOC per tire. Cooper Tire has requested federally enforceable limitations to restrict the annual tread end cement usage to 10,000 gallons per year. By incorporating this restriction into the permit, maximum annual emissions of VOC will be limited to 30.00 tons per year. This modification will result in a net increase of 9.19 tons of VOC.

D. Conclusion

By implementing annual restrictions on the tread end cement usage rate, Cooper Tire can effectively limit the potential to emit VOC from emissions unit K002 to 30.00 tons per year. Therefore, PSD permitting requirements will not be triggered.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install
Permit Number: 03-17298
Facility ID: 0332010003

Effective Date: To be entered upon final issuance

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:
NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	30.00



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

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

Facility ID: 0332010003
Permit Number: 03-17298
Permit Type: Chapter 31 mod
Issued: 7/16/2008
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

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

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17298

Facility ID: 0332010003

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0332010003

Facility Description: Tires and Inner Tubes

Application Number(s): A0004039

Permit Number: 03-17298

Permit Description: Automatic/Manual Tread End Cement Station (modification)

Permit Type: Chapter 31 mod

Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 7/16/2008

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 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

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install
Permit Number: 03-17298
Facility ID: 0332010003

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: 03-17298

Permit Description: Automatic/Manual Tread End Cement Station (modification)

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

Emissions Unit ID:	K002
Company Equipment ID:	10" x 6" Cold Feed Pin Barrel Line #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17298

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 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) The permittee must comply with all terms and conditions of this permit. 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 (i.e., postmarked) 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 (i.e., postmarked) 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) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.
- c) 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.
- d) 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



(i.e., postmarked) 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).

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 party 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 through completion of the annual PER covering the last period of operation 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 PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online 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 (i.e., postmarked), 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 Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17298

Facility ID: 0332010003

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17298

Facility ID: 0332010003

Effective Date: To be entered upon final issuance

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. This facility is subject to 40 CFR Part 63, Subpart XXXX, National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart XXXX. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 17 of 40 CFR Part 63, Subpart XXXX. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63 Subpart XXXX and Subpart A. The MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 03-17298

Facility ID: 0332010003

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K002, 10" x 6 " Cold Feed Pin Barrel Line #6

Operations, Property and/or Equipment Description:

Manual/Automatic Tread End Cement Station. Modification of PTI #03-13532 issued on 5/15/01 to allow for increased emissions due to automatic cement application.

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 operations(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. 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(A)(3)	<u>Emissions from Tread End Cement</u> 18.00 lbs of volatile organic compounds (VOC)/hour <u>Emissions from Cleanup Materials</u> 1070 lbs of VOC/month; 6.42 tons of VOC/year
b.	OAC rule 3745-31-05(D)	30.00 tons of VOC per rolling 12-month period from the use of tread end cement. See b)(2).
c.	40 CFR Part 60 Subpart BBB	The tread end cementing operation shall discharge into the atmosphere no more than 10 grams of VOC per tire cemented for each month.
d.	OAC rule 3745-21-09(X)(1)	See b)(2)b.
e.	40 CFR Part 63 Subpart XXXX	See Section B. Facility-Wide Terms and Conditions
f.	OAC rule 3745-17-11(B)	None. See b)(2)c.
g.	OAC rule 3745-17-07(A)	None. See b)(2)d.
h.	OAC rule 3745-17-11(C)	See b)(2)e and c)(3).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitation for purposes of avoiding PSD applicability.

i. Emissions of VOC from tread end cementing shall not exceed 30.00 tons per rolling 12-month period based on a tread end cement usage restriction (see section c)(1)) and a VOC content restriction (see c)(2)).



Rolling emission limitations were initially established in Permit to Install (PTI) #03-13532 issued on 5/15/01 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. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X)(1) pursuant to OAC rule 3745-21-09(X)(2)(d).
 - c. The uncontrolled mass rate of particulate emissions from K002 is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
 - d. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
 - e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(3) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
 - f. The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- c) Operational Restrictions
- (1) The maximum annual tread end cement usage shall not exceed 10,000 gallons per year, based upon a rolling, 12-month summation of the monthly gallon usage rates. The applicant will use existing records to determine compliance with the rolling 12-month restriction. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.
 - (2) The volatile organic compound (VOC) content of the tread end cement shall not exceed 6.00 pounds per gallon, as applied.
 - (3) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall also follow all of the following work practices:
 - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.



- b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) To demonstrate compliance with the limitations in section b)(1), the permittee shall collect and record the following information each month:
 - a. The name and identification of each tread end cement employed;
 - b. The VOC content of each tread end cement, in pounds per gallon, as applied;
 - c. The number of gallons of each tread end cement employed;
 - d. The VOC emission rate for each tread end cement employed, in pounds per month [d)(1)b. times x d)(1)c.];
 - e. The total cumulative VOC emission rate for all tread end cements [summation of d)(1)d.], in pounds per month;
 - f. The number of tires cemented;
 - g. The VOC emitted per tire cemented, in grams per tire [d)(1)e. divided by d)(1)f. times (453.5924 grams/1 pound)]; and



- h. The rolling 12-month summation of tread end cement usage (in gallons) and the rolling 12-month summation of the VOC emission rate (in tons) for all tread end cements.
- (2) The permittee shall collect and maintain monthly records of the following information for cleanup material usage:
 - a. The name and identification of each cleanup material employed;
 - b. The number of gallons of each cleanup material employed;
 - c. The VOC content of each cleanup material employed, in lbs/gallon;
 - d. The VOC emission rate for cleanup material [d)(2)b. times d)(2)c.], in lbs/month;
 - e. The total monthly VOC emission rate for all cleanup materials employed, in tons [summation of d)(2)d.]; and
 - f. The annual, year-to-date, VOC emissions, in tons, from all cleanup materials employed (sum of e) for each calendar month to date from January to December.

e) Reporting Requirements

- (1) Once every 6 months the permittee shall report each monthly average VOC emission rate that exceed the g/tire limit specified under 40 CFR 60.546(f)(1), as applicable for the affected facility.
- (2) The permittee shall submit deviation (excursion) reports which identify exceedances of the following:
 - a. The VOC content restriction;
 - b. The rolling 12-month tread end cement gallon usage limitation; and
 - c. The annual VOC limitation from the use of cleanup materials.

These reports shall be submitted in accordance with the Standards Terms and Conditions of this permit.

- (3) This emissions unit is subject to the applicable provisions of Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. Modification date (no later than 30 days after such date);
- b. Actual start-up date for modification (within 15 days after such date); and



- c. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Northwest District Office
Division of Air Pollution Control
347 North Dunbridge Road
Bowling Green, Ohio 43402

- (4) The permittee shall report the results of the following, as required under 40 CFR 60.546(c), for the first calendar month of operation after the modification:

- a. The mass of VOC used;
- b. The number of tires cemented;
- c. The mass of VOC emitted per tire cemented.

f) Testing Requirements

- (1) Compliance with the emission limitations contained in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation
18.00 lbs VOC/hour (from the use of cement)

Applicable Compliance Method

The hourly VOC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

If required, compliance with the VOC emission limitation shall be determined in accordance with the appropriate test methods and procedures from 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit is based on a maximum hourly cement usage rate of 3.00 gallons and a VOC content of 6.00 pounds per gallon, as applied.

- b. Emission Limitation
30.00 tons of VOC/year (from the use of cement)

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(1) of the terms and conditions of this permit.

- c. Emission Limitation
The tread end cementing operation shall discharge into the atmosphere no more than 10 grams of VOC per tire cemented for each month



Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in d)(1) of the terms and conditions of this permit.

d. Emission Limitation

1070.00 lbs of VOC/month (from the use of cleanup materials)

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in d)(2) of the terms and conditions of this permit.

e. Emission Limitation

6.42 tons of VOC/year (from the use of cleanup materials)

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(2) of the terms and conditions of this permit.

- (2) Method 24 or formulation data shall be used for the determination of the VOC content of cements. In the event of a 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.

g) Miscellaneous Requirements

- (1) Emissions unit K002 is subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.