



State of Ohio Environmental Protection Agency

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

8/12/2008

Eugene Gormley
Trelleborg Sealing Profiles NA
1780 Miller Pkwy
Streetsboro, OH 44241

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1667080043
Permit Number: 16-02519
Permit Type: Initial installation
County: Portage

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: ARAQMD

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



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Trelleborg Sealing Profiles NA**

Facility ID: 1667080043
Permit Number: 16-02519
Permit Type: Initial installation
Issued: 8/12/2008
Effective: 8/12/2008
Expiration: 8/12/2013



Air Pollution Permit-to-Install and Operate
for
Trelleborg Sealing Profiles NA

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Final Permit-to-Install and Operate
Permit Number: 16-02519
Facility ID: 1667080043
Effective Date: 8/12/2008

Authorization

Facility ID: 1667080043
Application Number(s): A0012115
Permit Number: 16-02519
Permit Description: Six Existing Rubber/Silicone Extrusion Units, Two New Silicone Extrusion Units.
Permit Type: Initial installation
Permit Fee: \$4,300.00
Issue Date: 8/12/2008
Effective Date: 8/12/2008
Expiration Date: 8/12/2013
Permit Evaluation Report (PER) Annual Date: Feb 15, for Jan 1 - Dec 31
This document constitutes issuance to:

Trelleborg Sealing Profiles NA
1780 Miller Pkwy
Streetsboro, OH 44241

of a Permit-to-Install and Operate 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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: 16-02519

Permit Description: Six Existing Rubber/Silicone Extrusion Units, Two New Silicone Extrusion Units.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	P001
Company Equipment ID:	Extrusion Line #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Extrusion Line #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Extrusion Line #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Extrusion Line #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Extrusion Line #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Extrusion Line #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Extrusion Line #7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Extrusion Line #8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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Final Permit-to-Install and Operate

Permit Number: 16-02519

Facility ID: 1667080043

Effective Date: 8/12/2008

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 16-02519

Facility ID: 1667080043

Effective Date: 8/12/2008

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 16-02519

Facility ID: 1667080043

Effective Date: 8/12/2008

C. Emissions Unit Terms and Conditions



1. P001, Extrusion Line #1

Operations, Property and/or Equipment Description:

EPDM hopper, extruder, salt bath curing line, microwave and infrared heating units.

a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).

(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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.

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)	The emissions of organic compounds (OC) shall not exceed 2.43 pounds per hour and 10.64 tons per year. See b)(2)b. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The emissions of total combined HAPs



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See c)(1) below.
c.	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.34 pound per hour and 1.49 tons per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

- a. The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

c) Operational Restrictions

- (1) The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds



1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(2)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(2)b.);
 - d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.



**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

(3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The Δ Toxic Air Contaminant Statute $\text{\textcircled{a}}$, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Δ Review of New Sources of Air Toxic Emissions, Option A $\text{\textcircled{a}}$, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., ΔX $\text{\textcircled{a}}$ hours per day and ΔY $\text{\textcircled{a}}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case $\text{\textcircled{a}}$ toxic contaminant(s):

Toxic Contaminant: Acetophenone



TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration[®], the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



- c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a modification or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
 - (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:



- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
 - ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
 - iii. the maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates; and
 - iv. the maximum allowable cumulative EPDM production rate levels in c)(1) above.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the A Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 2.43 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 10.64 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.



Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.34 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 1.49 tons per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g) **Miscellaneous Requirements**

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with A Toxic Air Contaminant Statute, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 16-02519

Facility ID: 1667080043

Effective Date: 8/12/2008

ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



2. P002, Extrusion Line #2

Operations, Property and/or Equipment Description:

EPDM hopper, extruder, salt bath curing line, infrared heating units.

- a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.
- 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)	The emissions of organic compounds (OC) shall not exceed 1.46 pounds per hour and 6.39 tons per year. See b)(2)b. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The emissions of total combined HAPs



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See c)(1) below.
c.	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.20 pound per hour and 0.88 ton per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

- a. The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

c) Operational Restrictions

- (1) The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds



1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(2)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(2)b.);
 - d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.



**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The Δ Toxic Air Contaminant Statute $\text{\textcircled{a}}$, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Δ Review of New Sources of Air Toxic Emissions, Option A $\text{\textcircled{a}}$, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., Δ X $\text{\textcircled{a}}$ hours per day and Δ Y $\text{\textcircled{a}}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case $\text{\textcircled{a}}$ toxic contaminant(s):

Toxic Contaminant: Acetophenone



TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration[®], the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



- c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a modification or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
 - (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:



- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
 - ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
 - iii. the maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates; and
 - iv. the maximum allowable cumulative EPDM production rate levels in c)(1) above.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute[@], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 1.46 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 6.39 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.



Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.88 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g) Miscellaneous Requirements

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with AToxic Air Contaminant Statute, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185



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ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



3. P003, Extrusion Line #3

Operations, Property and/or Equipment Description:

EPDM hopper, extruder, natural gas fired curing line, microwave heating unit.

- a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.
- 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)	<p>The emissions of organic compounds (OC) shall not exceed 1.46 pounds per hour and 6.39 tons per year.</p> <p>Natural gas combustion emissions from the curing oven shall not exceed the following:</p> <p>0.10 pound of carbon monoxide (CO) per hour and 0.44 ton of CO per year;</p> <p>0.22 pound of nitrogen oxides (NOx) per hour and 1.0 ton of NOx per year;</p> <p>0.013 pound of OC per hour and 0.06 ton of OC per year; and</p> <p>0.01 pound of PE/PM10 per hour and 0.04 ton of PE/PM10 per year.</p> <p>See b)(2)b. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See c)(1) below.</p>
c.	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.20 pound per hour and 0.88 ton per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

- a. The hourly and annual PE/PM10 emission limitations, hourly and annual OC emission limitations, and the hourly and annual natural gas combustion emissions limitations for CO, NOx, OC, and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.



c) Operational Restrictions

- (1) The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;



- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(2)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(2)b.);
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The ΔToxic Air Contaminant Statute^Δ, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled ΔReview of New Sources of Air Toxic Emissions, Option A^Δ, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) ΔThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices^Δ; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) ΔThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices^Δ; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.



- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., $\frac{AX}{8}$ hours per day and $\frac{AY}{5}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each

component toxic air contaminant in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration⁶, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a Amodification⁶ or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F),



initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

iii. the maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates; and

iv. the maximum allowable cumulative EPDM production rate levels in c)(1) above.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October



(covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute^e, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 1.46 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 6.39 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000



pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.88 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.



Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g. Emission Limitation:

Cure Oven - 0.10 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 0.0824 pound of CO emissions per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The CO emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

h. Emission Limitation:

Cure Oven - 0.22 pound of NOx

Applicable Compliance Method:

Compliance with the hourly allowable NOx emission limitation above shall be demonstrated by multiplying the NOx emission factor of 0.186 pound of NOx emissions per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The NOx emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The NOx emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

i. Emission Limitation:

Cure Oven - 0.013 pound of OC per hour

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0108 pound of OC emissions per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The OC emission factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The OC emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.



j. Emission Limitation:

Cure Oven - 0.01 pound of PE/PM10 per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE/PM10 limitation above shall be demonstrated by multiplying the PE/PM10 factor of 0.0075 pound of PE/PM10 per MM Btu heat input* by the maximum hourly heat input (1.2 MM Btu/hr).

*The PE/PM10 factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The PE/PM10 emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

k. Emissions Limitations:

Cure Oven - 0.44 ton of CO per year, 1.0 ton of NOx per year, 0.06 ton of OC per year, and 0.04 ton of PE/PM10 per year

Applicable Compliance Method:

The annual allowable emissions limitations above were determined by multiplying each hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emissions limitations are maintained, compliance with the annual allowable emissions limitations shall be assumed.

g) **Miscellaneous Requirements**

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with A Toxic Air Contaminant Statute, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



4. P004, Extrusion Line #4

Operations, Property and/or Equipment Description:

EPDM hopper, extruder, natural gas fired curing line, microwave heating unit.

- a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.
- 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)	<p>The emissions of organic compounds (OC) shall not exceed 1.46 pounds per hour and 6.39 tons per year.</p> <p>Natural gas combustion emissions from the curing oven shall not exceed the following:</p> <p>0.124 pound of carbon monoxide (CO) per hour and 0.54 ton of CO per year;</p> <p>0.28 pound of nitrogen oxides (NOx) per hour and 1.23 tons of NOx per year;</p> <p>0.02 pound of OC per hour and 0.09 ton of OC per year; and</p> <p>0.011 pound of PE/PM10 per hour and 0.05 ton of PE/PM10 per year.</p> <p>See b)(2)b. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See c)(1) below.</p>
c.	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.20 pound per hour and 0.88 ton per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

- a. The hourly and annual PE/PM10 emission limitations, hourly and annual OC emission limitations, and the hourly and annual natural gas combustion emissions limitations for CO, NOx, OC, and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.



c) Operational Restrictions

- (1) The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;



- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(2)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(2)b.);
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The AToxic Air Contaminant Statute^o, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A^o, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices^o; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices^o; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.



- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., $\frac{AX}{8}$ hours per day and $\frac{AY}{5}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each

component toxic air contaminant in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration⁶, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a Amodification⁶ or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F),



initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

iii. the maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates; and

iv. the maximum allowable cumulative EPDM production rate levels in c)(1) above.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October



(covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute^e, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 1.46 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 6.39 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000



pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.88 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.



Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g. Emission Limitation:

Cure Oven - 0.124 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 0.0824 pound of CO emissions per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The CO emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

h. Emission Limitation:

Cure Oven - 0.28 pound of NOx

Applicable Compliance Method:

Compliance with the hourly allowable NOx emission limitation above shall be demonstrated by multiplying the NOx emission factor of 0.186 pound of NOx emissions per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The NOx emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The NOx emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

i. Emission Limitation:

Cure Oven - 0.02 pound of OC per hour

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0108 pound of OC emissions per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The OC emission factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The OC emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.



j. Emission Limitation:

Cure Oven - 0.011 pound of PE/PM10 per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE/PM10 limitation above shall be demonstrated by multiplying the PE/PM10 factor of 0.0075 pound of PE/PM10 per MM Btu heat input* by the maximum hourly heat input (1.5 MM Btu/hr).

*The PE/PM10 factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The PE/PM10 emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

k. Emissions Limitations:

Cure Oven - 0.54 ton of CO per year, 1.23 tons of NOx per year, 0.09 ton of OC per year, and 0.05 ton of PE/PM10 per year

Applicable Compliance Method:

The annual allowable emissions limitations above were determined by multiplying each hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emissions limitations are maintained, compliance with the annual allowable emissions limitations shall be assumed.

g) Miscellaneous Requirements

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with A Toxic Air Contaminant Statute, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



5. P005, Extrusion Line #5

Operations, Property and/or Equipment Description:

EPDM hopper, extruder, natural gas fired curing line, microwave heating unit.

- a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.
- 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)	<p>The emissions of organic compounds (OC) shall not exceed 2.43 pounds per hour and 10.64 tons per year.</p> <p>Natural gas combustion emissions from the curing oven shall not exceed the following:</p> <p>0.33 pound of carbon monoxide (CO) per hour and 1.45 tons of CO per year;</p> <p>0.75 pound of nitrogen oxides (NOx) per hour and 3.29 tons of NOx per year;</p> <p>0.04 pound of OC per hour and 0.18 ton of OC per year; and</p> <p>0.03 pound of PE/PM10 per hour and 0.13 ton of PE/PM10 per year.</p> <p>See b)(2)b. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	<p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See c)(1) below.</p>
c.	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.34 pound per hour and 1.49 tons per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

- a. The hourly and annual PE/PM10 emission limitations, hourly and annual OC emission limitations, and the hourly and annual natural gas combustion emissions limitations for CO, NOx, OC, and PE/PM10 are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.



c) Operational Restrictions

- (1) The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds
1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;



- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(2)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(2)b.);
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The AToxic Air Contaminant Statute^o, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A^o, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices^o; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices^o; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.



- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., $\frac{AX}{8}$ hours per day and $\frac{AY}{5}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 72.8

MAGLC (ug/m³): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each

component toxic air contaminant in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration⁶, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a Amodification⁶ or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F),



initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions;

iii. the maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates; and

iv. the maximum allowable cumulative EPDM production rate levels in c)(1) above.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October



(covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute^e, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 2.43 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 10.64 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000



pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.34 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 1.49 tons per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.



Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g. Emission Limitation:

Cure Oven - 0.33 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 0.0824 pound of CO emissions per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The CO emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

h. Emission Limitation:

Cure Oven - 0.75 pound of NOx

Applicable Compliance Method:

Compliance with the hourly allowable NOx emission limitation above shall be demonstrated by multiplying the NOx emission factor of 0.186 pound of NOx emissions per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The NOx emission factor is from AP-42, 5th edition, Table 1.4-1, dated 2/98. The NOx emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

i. Emission Limitation:

Cure Oven - 0.04 pound of OC per hour

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 0.0108 pound of OC emissions per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The OC emission factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The OC emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.



j. Emission Limitation:

Cure Oven - 0.03 pound of PE/PM10 per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE/PM10 limitation above shall be demonstrated by multiplying the PE/PM10 factor of 0.0075 pound of PE/PM10 per MM Btu heat input* by the maximum hourly heat input (4.0 MM Btu/hr).

*The PE/PM10 factor is from AP-42, 5th edition, Table 1.4-2, dated 2/98. The PE/PM10 emission factor is converted from lb/10⁶ scf to lb/MM Btu by dividing by 1020.

k. Emissions Limitations:

Cure Oven – 1.45 tons of CO per year, 3.29 tons of NOx per year, 0.18 ton of OC per year, and 0.13 ton of PE/PM10 per year

Applicable Compliance Method:

The annual allowable emissions limitations above were determined by multiplying each hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emissions limitations are maintained, compliance with the annual allowable emissions limitations shall be assumed.

g) Miscellaneous Requirements

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with A Toxic Air Contaminant Statute, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



6. P006, Extrusion Line #6

Operations, Property and/or Equipment Description:

EPDM hopper, extruder, salt bath curing line, microwave and infrared heating units.

- a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.
- 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)	The emissions of organic compounds (OC) shall not exceed 4.28 pounds per hour and 18.75 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See c)(1) below.
c.	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.60 pound per hour and 2.63 tons per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
e.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

a. The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) The maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative EPDM Production</u>
1	2,500,000 pounds
1-2	5,000,000 pounds
1-3	7,500,000 pounds
1-4	10,000,000 pounds
1-5	12,500,000 pounds
1-6	15,000,000 pounds
1-7	17,500,000 pounds
1-8	20,000,000 pounds



1-9	22,500,000 pounds
1-10	25,000,000 pounds
1-11	27,500,000 pounds
1-12	30,000,000 pounds

After the first 12 calendar months following the issuance of this permit, compliance with the annual EPDM production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

Note: The silicone production rate is not limited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, and P006, combined:
 - a. the production rate for each product for each month, in pounds; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the EPDM production rates.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative EPDM production rate for each calendar month.

- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(2)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(2)b.);
 - d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust



system, as specified by the permittee in the permit application. The Δ Toxic Air Contaminant Statute $\text{\textcircled{R}}$, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Δ Review of New Sources of Air Toxic Emissions, Option A $\text{\textcircled{R}}$, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{R}}$; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{R}}$; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., Δ X $\text{\textcircled{R}}$ hours per day and Δ Y $\text{\textcircled{R}}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case $\text{\textcircled{R}}$ toxic contaminant(s):

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23



MAGLC (ug/m3): 1170

Toxic Contaminant: Carbon Disulfide

TLV (mg/m3): 3.11

Maximum Hourly Emission Rate (lbs/hr): 4.57**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 72.8

MAGLC (ug/m3): 74

*Combined emission rate from emissions units P001 through P008.

**Combined emission rate from emissions unit P001 through P006

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F).

The permittee, having demonstrated that emissions of carbon disulfide, from emissions units P001-P006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration[®], the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines that the AToxic Air Contaminant Statute[®], ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a Amodification[®] or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
 - (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
 - ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
 - iii. the maximum annual EPDM production rate for emissions units P001, P002, P003, P004, P005, and P006, combined, shall not exceed 30,000,000 pounds, based upon a rolling, 12-month summation of the production rates; and
 - iv. the maximum allowable cumulative EPDM production rate levels in c)(1) above.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):



a. Emission Limitation:

The emissions of OC shall not exceed 4.28 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.00194 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 18.75 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(2) above.



d. Emission Limitation:

The PE/PM10 shall not exceed 0.60 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 2.63 tons per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g) Miscellaneous Requirements

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with AToxic Air Contaminant Statute@, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 16-02519

Facility ID: 1667080043

Effective Date: 8/12/2008

WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



7. P007, Extrusion Line #7

Operations, Property and/or Equipment Description:

Silicone hopper, extruder, salt bath curing line, infrared heating units.

- a) 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. b)(1)b., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)a., c)(1), d)(1), d)(2), e)(1), and f)(1)a.
- 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(D) (synthetic minor to avoid Title V)	The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See c)(1) below.
b.	OAC rule 3745-31-05(E)	The particulate emissions (PE)/particulate



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(voluntary restrictions to avoid state modeling)	matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.16 pound per hour and 0.70 ton per year.
	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compounds (OC), PE, and PM10 emissions from this air contaminant source since the uncontrolled potential to emit for OC, PE, and PM10 are each less than ten tons per year.
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

a. The hourly and annual PE/PM10 emission limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) This emissions unit shall only manufacturer silicone products.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:

- a. the production rate for each product for each month, in pounds;
- b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(1)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
- c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(1)b.);
- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.



Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (2) The permittee shall maintain a daily production log to document what was manufactured in this emissions unit.
- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The Δ Toxic Air Contaminant Statute $\text{\textcircled{a}}$, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Δ Review of New Sources of Air Toxic Emissions, Option A $\text{\textcircled{a}}$, as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\text{\textcircled{a}}$; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., Δ X $\text{\textcircled{a}}$ hours per day and Δ Y $\text{\textcircled{a}}$ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was



(and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

*Combined emission rate from emissions units P001 through P008.

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a modification or if a new toxic is emitted, or the modeled toxic(s) is/are



expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute⁶, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;



- ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions; and
- iii. this emissions unit shall only manufacturer silicone products.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
 - a. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install



exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

b. Emission Limitation:

The PE/PM10 shall not exceed 0.16 pound per hour.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

c. Emission Limitation:

The PE/PM10 shall not exceed 0.70 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

d. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g) Miscellaneous Requirements

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with A Toxic Air Contaminant Statute, ORC 3704.03(F):



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: 16-02519
Facility ID: 1667080043
Effective Date: 8/12/2008

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.



8. P008, Extrusion Line #8

Operations, Property and/or Equipment Description:

Silicone hopper, extruder, salt bath curing line, infrared heating units.

- a) 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. b)(1)c., d)(3), d)(4), d)(5), d)(6), e)(2), and g)(1).
 - (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. b)(1)b., c)(1), d)(1), d)(2), e)(1), and f)(1)c.
- 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)	The emissions of organic compounds (OC) shall not exceed 0.93 pound per hour and 4.1 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-05(E), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See c)(1) below.
	OAC rule 3745-31-05(E) (voluntary restrictions to avoid state modeling)	The particulate emissions (PE)/particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM10) shall not exceed 0.16 pound per hour and 0.70 ton per year.
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

- a. The hourly and annual PE/PM10 and hourly and annual OC emissions limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- b. OAC rule 3745-31-05(A)(3) is applicable to this emissions unit since it was installed prior to August 3, 2006.

c) Operational Restrictions

- (1) This emissions unit shall only manufacturer silicone products.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, P004, P005, P006, P007, and P008, combined:
 - a. the production rate for each product for each month, in pounds;
 - b. the total individual HAP emissions for each HAP, in tons per month (i.e., the sum of d)(1)a. times (Y*) for each product plus (Z**)/12, and then dividing by 2000 pounds per ton);
 - c. the total combined HAPs emissions, in tons per month (i.e., the sum of the total individual HAP emissions in d)(1)b.);



- d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of each individual HAP and total combined HAPs emissions, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative emissions for each individual HAP and total combined HAPs for each calendar month.

*Y is the sum of the individual HAP emission factors for each HAP for extrusion and hot air curing of rubber in the draft AP-42 Tables 4.12-6 and 4.12-10.

**Z is the potential to emit of each individual HAP for all permit to install exempt and "de minimis" emissions units in tons per year.

- (2) The permittee shall maintain a daily production log to document what was manufactured in this emissions unit.
- (3) The permit to install for these emissions units P001 through P008 was evaluated based on the actual materials and the design parameters of the emissions units= exhaust system, as specified by the permittee in the permit application. The AToxic Air Contaminant Statute[®], ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A[®], as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices[®]; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices[®]; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).



- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., ΔX hours per day and ΔY days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Δ worst case Δ toxic contaminant(s):

Toxic Contaminant: Acetophenone

TLV (mg/m³): 49.12

Maximum Hourly Emission Rate (lbs/hr): 1.48*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23

MAGLC (ug/m³): 1170

*Combined emission rate from emissions units P001 through P008.

The permittee, has demonstrated that emissions of acetophenone, from emissions units P001-P008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Δ Toxic Air Contaminant Statute Δ , ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration Δ , the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Δ Toxic Air Contaminant Statute Δ , ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to



a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a modification or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- i. the emissions of any individual HAP from the entire facility shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions;
- ii. the emissions of total combined HAPs from the entire facility shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions; and
- iii. this emissions unit shall only manufacturer silicone products.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s), emissions, or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of OC shall not exceed 0.93 pound per hour.

Applicable Compliance Method:



Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the worst-case draft AP-42 OC emission factor of 0.001556 pounds of OC per pound of rubber* by the maximum hourly production rate (in pounds).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*The sum of the extrusion and hot air curing OC emission factors from the draft AP-42 Tables 4.12-6 and 4.12-10.

b. Emission Limitation:

The emissions of OC shall not exceed 4.1 tons per year.

Applicable Compliance Method:

The annual allowable OC limitation above was determined by multiplying the hourly allowable OC limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

c. Emission Limitations:

The emissions of any individual HAP from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 9.88 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAPs from the entire facility (i.e., emissions units P001, P002, P003, P004, P005, P006, P007, P008, and permit to install exempt and "de minimis" emissions units, combined) shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

d. Emission Limitation:

The PE/PM10 shall not exceed 0.16 pound per hour.



Applicable Compliance Method:

If required, compliance with the hourly allowable PE/PM10 limitation above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A for PE and Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M for PM10.

e. Emission Limitation:

The PE/PM10 shall not exceed 0.70 ton per year.

Applicable Compliance Method:

The annual allowable PE/PM10 limitation above was determined by multiplying the hourly allowable PE/PM10 limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

f. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

g) Miscellaneous Requirements

- (1) Within 90 days of the final issuance of this permit to install, the permittee shall install and/or modify the following stacks to be equal to or greater than the stack heights and velocities as described below to comply with A Toxic Air Contaminant Statute, ORC 3704.03(F):

<u>Stack ID</u>	<u>Stack Height from Ground (feet)</u>	<u>Stack Velocity (feet/min)</u>
COMB01	50.2	2329
COMB02	50.2	1935
ROOF01	32.0	3185
ROOF02	32.0	3185
ROOF03	42.0	3185
ROOF04	42.0	5732
RVENT01	18.0	1415
RVENT02	18.0	1415
WALL01	6.0	1035
WALL02	6.0	1035

All the above-mentioned stacks shall be unobstructed and vertical.