



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

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

9/4/2008

Certified Mail

Bryan Thompson  
Veyance Technologies, Inc.  
13601 Industrial Parkway  
Marysville, OH 43040

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0180010013  
Permit Number: P0103701  
Permit Type: Administrative Modification  
County: Union

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Journal Tribune. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-CDO

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



PUBLIC NOTICE  
Issuance Of Draft Air Pollution Permit-To-Install  
Veyance Technologies, Inc.

Issue Date: 9/4/2008  
Permit Number: P0103701  
Permit Type: Administrative Modification  
Permit Description: Administrative modification to 5 presses to add federally enforceable restrictions on hazardous air pollutants  
Facility ID: 0180010013  
Facility Location: Veyance Technologies, Inc.  
13601 Industrial Parkway,  
Marysville, OH 43040  
Facility Description: Rubber and Plastics Hoses and Belting Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Jennifer Carlin at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Veyance Technologies Inc. (Veyance) manufactures and markets engineered rubber products in the United States and internationally. The company offers products ranging from conveyer belts, air springs, molded products, and tank tracks for military and off-road vehicles.

The Veyance facility in Marysville, OH is applying for a PTI modification to add federally enforceable restrictions to emissions of hazardous air pollutants (HAP) from 12 emissions units at the facility (five presses in this permit). The permit includes five presses involved in processing rolls of uncured, fabric coated rubber belts, unrolling them and feeding them through the curing press where they are cured with non-contact steam heat and pressure. The presses are open and all emissions are emitted as fugitives into the building.

3. Facility Emissions and Attainment Status:

Veyance Technologies is located in Union County which is attainment for both the 8-hour ozone standard and for PM 2.5. The facility currently operates under a Title V permit. The potential to emit for HAPs emissions are being restricted in this permit to 9.7 tons of individual HAPs per rolling, 12-months and 21.6 tons of combined HAP's per rolling, 12-month period which will effectively restrict the facility to below the major source thresholds. The federally enforceable HAP emission limitations are being ensured by an operational restriction on the amount of rubber that can be processed in the 12 presses on a rolling, 12-month basis.

4. Applicable rules:

The emissions units are subject to BAT for OC and contain federally enforceable limitations for HAP emissions under OAC rule 3745-31-05. OAC rule 3745-21-07(G) is listed because this is a Title V facility but does not have any requirements because of the use of no PRM's.

5. Please provide additional notes or comments as necessary:

The permit is an administrative modification of PTI's 01-08193, 01-08807, and 01-8929. The only changes to the original permit terms were the addition of federally enforceable limitations on HAPs. Emissions units P005, P006, P007, P010, P011, P013, and P014 were part of the federally enforceable limitation but are not included in this PTI because they were all installed prior to 1974 and have not been modified. The federally enforceable restriction will be incorporated into the Title V permit to operate.

6. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Emissions (tons per year)</u>
Individual HAP	9.7
Combined HAPs	21.6
OC	53.1 (no change)





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

**DRAFT**

**Air Pollution Permit-to-Install  
for  
Veyance Technologies, Inc.**

Facility ID: 0180010013  
Permit Number: P0103701  
Permit Type: Administrative Modification  
Issued: 9/4/2008  
Effective: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 Veyance Technologies, Inc.

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103701

**Facility ID:** 0180010013

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0180010013

Facility Description: Rubber and plastics hose and belting.

Application Number(s): A0001718

Permit Number: P0103701

Permit Description: Administrative modification to 5 presses to add federally enforceable restrictions on hazardous air pollutants

Permit Type: Administrative Modification

Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/4/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Veyance Technologies, Inc.  
13601 Industrial Parkway  
Marysville, OH 43040

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0103701

Permit Description: Administrative modification to 5 presses to add federally enforceable restrictions on hazardous air pollutants

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

<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	Press #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	Press #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	Rotocure #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Press #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Press #7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103701

**Facility ID:** 0180010013

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e.,



postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## **15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103701

**Facility ID:** 0180010013

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103701

**Facility ID:** 0180010013

**Effective Date:** To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103701

**Facility ID:** 0180010013

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P008, Press #4**

**Operations, Property and/or Equipment Description:**

Curing press no 4

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 223.70 lbs/day, 12.74 tons/yr and 40.68 tons per year from emissions units P005 through P014. See b)(2)c. below.
b.	OAC rule 3745-21-07(G)	This emissions unit is exempt from the emission limitation/control requirements contained in OAC rule 3745-21-07(G) because no photochemically reactive materials are employed. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT)	See b)(2)a. and c)(1) below.

(2) Additional Terms and Conditions

a. The emissions of individual hazardous air pollutants (Individual HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation of the individual HAP emissions.

The emissions of combined hazardous air pollutants (HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation of the combined HAP emissions.

A listing of the HAPs can be found in Section 112(b) of the Clear Air Act can be obtained by contacting your Ohio EPA field office or local air agency contact.



- b. The OC emission limitation of no photochemically reactive materials (i.e., as raw materials or cleanup materials) employed in this emissions unit shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds.
  - c. The daily emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.
- c) Operational Restrictions
- (1) The permittee shall not exceed 119,712,096 pounds of rubber throughput from emissions units P005 through P014, P019, and P020, per year based on a rolling 12-month summation of throughput figures. The facility has existing records to demonstrate compliance with the operational restriction, therefore, a monthly schedule of throughput restriction is not necessary.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record following information on a monthly basis for emissions units P005 through P014, P019 and P020 combined for the purpose of determining OC emissions;
    - a. the number of pounds or tons of rubber processed;
    - b. the number of gallons of mold release employed;
    - c. the OC content of the mold release, in pounds or tons;
    - d. the total OC emissions from the rubber processed and mold release employed combined, calculated as follows:  
  
[(the total amount of rubber processed in emissions units P005 through P014, P019 and P020) x (the appropriate Draft AP-42 Rubber Manufacturers Association (RMA) emission factor, Table 4.12-8 for platen press curing, July 1999)] + [(the total amount of mold release employed by emissions units P005 through P014, P019 and P020) x (actual OC content of the mold release)] x [percent production associated with P008 of 31.3%]
    - e. the annual OC emissions for this emissions unit, as a monthly summation of d)(1)d. above.
  - (2) The permittee shall collect and record the following records on a monthly basis to document compliance with emissions limitations for emission units P005 through P014, P019, and P020 for the purpose of determining HAP emissions:
    - a. the company identification for each uncured rubber, fabric material, and mold release employed;
    - b. the number of pounds of uncured rubber and fabric material employed;



- c. the number of gallons of mold release employed;
- d. the number of pounds of rubber throughput (finished product);
- e. the calculated individual HAP emissions for the current month, in pounds or tons;
- f. the calculated total combined HAP emissions for the current month, in pounds or tons;
- g. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months); and
- h. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months).
- i. the rolling 12-month summation of rubber throughput in pounds per year (i.e., the total lbs. or rubber throughput from the current month added to the summation of the total rubber throughput from the previous 11 months).

e) Reporting Requirements

- (1) The permittee shall submit annual reports by April 15<sup>th</sup> which specify the total OC emissions from this emissions unit and the total for emissions units P005 through P015 for the previous calendar year. The report requirement may be satisfied by including this emissions unit in the annual Fee Emission Report.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. as determined by recordkeeping in d)(2)g. above, an exceedance of the rolling 12-month summation of Individual HAP emissions;
  - b. as determined by recordkeeping in d)(2)h. above, an exceedance of the rolling 12-month summation of total combined HAP emissions; and
  - c. as determined by recordkeeping in d)(2)i. above, an exceedance of the rolling 12-month summation of rubber throughput.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
  
Organic compound emissions shall not exceed 223.70 lbs OC/day from this emissions unit.



Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum amount of rubber processed in one day 124,131 lbs/day, by the highest Draft AP-42 emission factor, Table 4.12 July 31, 1999, for the types of rubber used in this emissions unit of 0.00175 lb OC/lb rubber plus emissions from mold release of 12.43 lbs/day multiplied by 0.52 lbs OC/lb rubber.

b. Emission Limitation:

Organic compound emissions shall not exceed 12.74 tons/year from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the pounds of rubber processed per year, recorded in d)(1) by the appropriate Draft AP-42 RMA emission factor, Table 4.12 July 31, 1999, for the specific type of rubber plus the emissions from mold release then multiplied by the percentage of production allocated to this emissions unit (31.3%).

c. Emission Limitation:

40.68 tons/yr from emissions units P005 through P014.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the pounds of rubber processed per year, recorded in d)(1) by the appropriate Draft AP-42 RMA emission factor, Table 4.12 July 31, 1999, for the specific type of rubber and then plus the emissions from mold release.

d. Emission Limitation:

Emissions of Individual HAP from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation. Emissions of total combined HAP from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in d)(2) above.

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08193 issued on 1/15/08.



**2. P009, Press #5**

**Operations, Property and/or Equipment Description:**

Curing press no 5

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 223.70 lbs/day, 12.74 tons/yr and 40.68 tons per year from emissions units P005 through P014. See b)(2)c. below.
b.	OAC rule 3745-21-07(G)	This emissions unit is exempt from the emission limitation/control requirements contained in OAC rule 3745-21-07(G) because no photochemically reactive materials are employed. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT)	See b)(2)a. and c)(1) below.

(2) Additional Terms and Conditions

a. The emissions of individual hazardous air pollutants (Individual HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation of the individual HAP emissions.

The emissions of combined hazardous air pollutants (HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation of the combined HAP emissions.

A listing of the HAPs can be found in Section 112(b) of the Clear Air Act can be obtained by contacting your Ohio EPA field office or local air agency contact.



- b. The OC emission limitation of no photochemically reactive materials (i.e., as raw materials or cleanup materials) employed in this emissions unit shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds.
  - c. The daily emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.
- c) Operational Restrictions
- (1) The permittee shall not exceed 119,712,096 pounds of rubber throughput from emissions units P005 through P014, P019, and P020, per year based on a rolling 12-month summation of throughput figures. The facility has existing records to demonstrate compliance with the operational restriction, therefore, a monthly schedule of throughput restriction is not necessary.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record following information on a monthly basis for emissions units P005 through P014, P019 and P020 combined for the purpose of determining OC emissions;
    - a. the number of pounds or tons of rubber processed
    - b. the number of gallons of mold release employed;
    - c. the OC content of the mold release, in pounds or tons;
    - d. the total OC emissions from the rubber processed and mold release employed combined, calculated as follows:  
  
[(the total amount of rubber processed in emissions units P005 through P014, P019 and P020) x (the appropriate Draft AP-42 Rubber Manufacturers Association (RMA) emission factor, Table 4.12-8 for platen press curing, July 1999)] + [(the total amount of mold release employed by emissions units P005 through P014, P019 and P020) x (actual OC content of the mold release)] x [percent production associated with P009 of 31.3%]
    - e. the annual OC emissions for this emissions unit, as a monthly summation of d)(1)d. above.
  - (2) The permittee shall collect and record the following records on a monthly basis to document compliance with emissions limitations for emission units P005 through P014, P019, and P020 for the purpose of determining HAP emissions:
    - a. the company identification for each uncured rubber, fabric material, and mold release employed;
    - b. the number of pounds of uncured rubber and fabric material employed;



- c. the number of gallons of mold release employed;
- d. the number of pounds of rubber throughput (finished product);
- e. the calculated individual HAP emissions for the current month, in pounds or tons;
- f. the calculated total combined HAP emissions for the current month, in pounds or tons;
- g. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months); and
- h. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months).
- i. the rolling 12-month summation of rubber throughput in pounds per year (i.e., the total lbs. or rubber throughput from the current month added to the summation of the total rubber throughput from the previous 11 months).

e) Reporting Requirements

- (1) The permittee shall submit annual reports by April 15<sup>th</sup> which specify the total OC emissions from this emissions unit and the total for emissions units P005 through P015 for the previous calendar year. The report requirement may be satisfied by including this emissions unit in the annual Fee Emission Report.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. as determined by recordkeeping in d)(2)g. above, an exceedance of the rolling 12-month summation of Individual HAP emissions;
  - b. as determined by recordkeeping in d)(2)h. above, an exceedance of the rolling 12-month summation of total combined HAP emissions; and
  - c. as determined by recordkeeping in d)(2)i. above, an exceedance of the rolling 12-month summation of rubber throughput.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
  
Organic compound emissions shall not exceed 223.70 lbs OC/day from this emissions unit.



Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum amount of rubber processed in one day 124,131 lbs/day, by the highest Draft AP-42 emission factor, Table 4.12 July 31, 1999, for the types of rubber used in this emissions unit of 0.00175 lb OC/lb rubber plus emissions from mold release of 12.43 lbs/day multiplied by 0.52 lbs OC/lb rubber.

b. Emission Limitation:

Organic compound emissions shall not exceed 12.74 tons/year from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the pounds of rubber processed per year, recorded in d)(1) by the appropriate Draft AP-42 RMA emission factor, Table 4.12 July 31, 1999, for the specific type of rubber plus the emissions from mold release then multiplied by the percentage of production allocated to this emissions unit (31.3%).

c. Emission Limitation:

40.68 tons/yr from emissions units P005 through P014.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the pounds of rubber processed per year, recorded in d)(1) by the appropriate Draft AP-42 RMA emission factor, Table 4.12 July 31, 1999, for the specific type of rubber and then plus the emissions from mold release.

d. Emission Limitation:

Emissions of Individual HAP from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation. Emissions of total combined HAP from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in d)(2) above.

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08193 issued on 1/15/08.



**3. P012, Rotocure #3**

**Operations, Property and/or Equipment Description:**

Rotocure no 3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 47.52 lbs/day, 2.77 tons/yr and 40.68 tons per year from emissions units P005 through P014.
b.	OAC rule 3745-21-07(G)	This emissions unit is exempt from the emission limitation/control requirements contained in OAC rule 3745-21-07(G) because no photochemically reactive materials are employed. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT)	See b)(2)a. and c)(1) below.

(2) Additional Terms and Conditions

a. The emissions of individual hazardous air pollutants (Individual HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation of the individual HAP emissions.

The emissions of combined hazardous air pollutants (HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation of the combined HAP emissions.

A listing of the HAPs can be found in Section 112(b) of the Clear Air Act can be obtained by contacting your Ohio EPA field office or local air agency contact.



- b. The OC emission limitation of no photochemically reactive materials (i.e., as raw materials or cleanup materials) employed in this emissions unit shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds.
- c) Operational Restrictions
  - (1) The permittee shall not exceed 119,712,096 pounds of rubber throughput from emissions units P005 through P014, P019, and P020, per year based on a rolling 12-month summation of throughput figures. The facility has existing records to demonstrate compliance with the operational restriction, therefore, a monthly schedule of throughput restriction is not necessary.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record following information on a monthly basis for emissions units P005 through P014, P019 and P020 combined for the purpose of determining OC emissions:
    - a. the number of pounds or tons of rubber processed;
    - b. the number of gallons of mold release employed;
    - c. the OC content of the mold release, in pounds or tons;
    - d. the total OC emissions from the rubber processed and mold release employed combined, calculated as follows:

[(the total amount of rubber processed in emissions units P005 through P014, P019 and P020) x (the appropriate Draft AP-42 Rubber Manufacturers Association (RMA) emission factor, Table 4.12-8 for platen press curing, July 1999)] + [(the total amount of mold release employed by emissions units P005 through P014, P019 and P020) x (actual OC content of the mold release)] x [percent production associated with P012 of 6.8%]
    - e. the annual OC emissions for this emissions unit, as a monthly summation of d)(1)d. above.
  - (2) The permittee shall collect and record the following records on a monthly basis to document compliance with emissions limitations for emission units P005 through P014, P019, and P020 for the purpose of determining HAP emissions:
    - a. the company identification for each uncured rubber, fabric material, and mold release employed;
    - b. the number of pounds of uncured rubber and fabric material employed;
    - c. the number of gallons of mold release employed;
    - d. the number of pounds of rubber throughput (finished product);
    - e. the calculated individual HAP emissions for the current month, in pounds or tons;



- f. the calculated total combined HAP emissions for the current month, in pounds or tons;
- g. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months); and
- h. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months).
- i. the rolling 12-month summation of rubber throughput in pounds per year (i.e., the total lbs. or rubber throughput from the current month added to the summation of the total rubber throughput from the previous 11 months).

e) Reporting Requirements

- (1) The permittee shall submit annual reports by April 15<sup>th</sup> which specify the total OC emissions from this emissions unit and the total for emissions units P005 through P015 for the previous calendar year. The report requirement may be satisfied by including this emissions unit in the annual Fee Emission Report.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. as determined by recordkeeping in d)(2)g. above, an exceedance of the rolling 12-month summation of Individual HAP emissions;
  - b. as determined by recordkeeping in d)(2)h. above, an exceedance of the rolling 12-month summation of total combined HAP emissions; and
  - c. as determined by recordkeeping in d)(2)i. above, an exceedance of the rolling 12-month summation of rubber throughput.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

Organic compound emissions shall not exceed 47.52 lbs OC/day from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum amount of rubber processed in one day 26,976 lbs/day, by the highest Draft AP-42 emission factor, Table 4.12 July 31, 1999, for the types of rubber used in this emissions unit of



0.00175 lb OC/lb rubber plus emissions from mold release of 0.62 lbs/day multiplied by 0.45 lbs OC/lb rubber.

b. Emission Limitation:

Organic compound emissions shall not exceed 2.77 tons/year from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the pounds of rubber processed per year, recorded in d)(1) by the appropriate Draft AP-42 RMA emission factor, Table 4.12 July 31, 1999, for the specific type of rubber plus the emissions from mold release then multiplied by the percentage of production allocated to this emissions unit (6.8%).

c. Emission Limitation:

40.68 tons/yr from emissions units P005 through P014.

Applicable Compliance Method:

Compliance shall be demonstrated by the pounds of rubber processed per year, recorded in d)(1) by the appropriate Draft AP-42 RMA emission factor, Table 4.12 July 31, 1999, for the specific type of rubber plus emissions from mold release.

d. Emission Limitation:

Emissions of Individual HAP from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation. Emissions of total combined HAP from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in d)(2) above.

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08193 issued on 1/15/08.



**4. P019, Press #6**

**Operations, Property and/or Equipment Description:**

Press No. 6 - press used to cure rubber belts

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 38.58 lbs/day and 7.0 tons/yr from this emissions unit.  See b)(2)a. below.
b.	OAC rule 3745-21-07(G)	This emissions unit is exempt from the emission limitation/control requirements contained in OAC rule 3745-21-07(G) because no photochemically reactive materials are employed. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT)	See b)(2)c. and c)(1) below.

(2) Additional Terms and Conditions

a. The daily emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

b. The OC emission limitation of no photochemically reactive materials (i.e., as raw materials or cleanup materials) employed in this emissions unit shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds.

c. The emissions of individual hazardous air pollutants (Individual HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons



per year, based upon a rolling, 12-month summation of the individual HAP emissions.

The emissions of combined hazardous air pollutants (HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation of the combined HAP emissions.

A listing of the HAPs can be found in Section 112(b) of the Clear Air Act can be obtained by contacting your Ohio EPA field office or local air agency contact.

c) Operational Restrictions

- (1) The permittee shall not exceed 119,712,096 pounds of rubber throughput from emissions units P005 through P014, P019, and P020, per year based on a rolling 12-month summation of throughput figures. The facility has existing records to demonstrate compliance with the operational restriction, therefore, a monthly schedule of throughput restriction is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record following information on a monthly basis for emissions units P005 through P014, P019 and P020 combined for the purpose of determining OC emissions:

- a. the type and amount (in tons) of rubber processed;
- b. the number of gallons of mold release employed;
- c. the OC content of the mold release, in pounds per gallon;
- d. the total OC emissions from the rubber processed and mold release employed combined, calculated as follows:

[(the total amount of rubber processed in emissions units P005 through P014, P019 and P020) x (the appropriate Draft AP-42 Rubber Manufacturers Association (RMA) emission factor, Table 4.12-8 for platen press curing, July 1999)] + [(the total amount of mold release employed by emissions units P005 through P014, P019 and P020) x (actual OC content of the mold release)] x [percent production associated with P019 of 5.2%]

- e. the annual OC emissions for this emissions unit, as a monthly summation of d)(1)d. above.

- (2) The permittee shall collect and record the following records on a monthly basis to document compliance with emissions limitations for emission units P005 through P014, P019, and P020 for the purpose of determining HAP emissions:

- a. the company identification for each uncured rubber, fabric material, and mold release employed;
- b. the number of pounds of uncured rubber and fabric material employed;
- c. the number of gallons of mold release employed;



- d. the number of pounds of rubber throughput (finished product);
- e. the calculated individual HAP emissions for the current month, in pounds or tons;
- f. the calculated total combined HAP emissions for the current month, in pounds or tons;
- g. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months); and
- h. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months).
- i. the rolling 12-month summation of rubber throughput in pounds per year (i.e., the total lbs. or rubber throughput from the current month added to the summation of the total rubber throughput from the previous 11 months).

e) Reporting Requirements

- (1) The permittee shall submit annual reports by April 15<sup>th</sup> which specify the total OC emissions from this emissions unit and the total for emissions units P005 through P015 for the previous calendar year. The report requirement may be satisfied by including this emissions unit in the annual Fee Emission Report.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. as determined by recordkeeping in d)(2)g. above, an exceedance of the rolling 12-month summation of Individual HAP emissions;
  - b. as determined by recordkeeping in d)(2)h. above, an exceedance of the rolling 12-month summation of total combined HAP emissions; and
  - c. as determined by recordkeeping in d)(2)i. above, an exceedance of the rolling 12-month summation of rubber throughput.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
OC emissions shall not exceed 38.58 lbs/day from this emissions unit.



Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum amount of rubber processed per day (21,913 lbs/day) by the highest Draft AP-42 emission factor (Table 4.12, July 31, 1999) for the types of rubber used in this emission unit (maximum of 0.00175 lb OC/lb rubber). The rubber emissions shall be added to the daily emissions from mold release (maximum usage of mold release multiplied by the mold release OC content) to obtain the total maximum daily emissions, in pounds.

b. Emission Limitation:

OC emissions shall not exceed 7.0 tons/yr from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated through the records required pursuant to d)(1)e. of this permit.

c. Emission Limitation:

Emissions of Individual HAP from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation. Emissions of total combined HAP from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in d)(2) above.

- (2) Formulation data or USEPA Method 24 shall be used to determine the OC content of the mold release.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
- (2) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-088807 issued on 1/2/04.



**5. P020, Press #7**

**Operations, Property and/or Equipment Description:**

Curing press no. 7, used to cure rubber belts (modification)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 29.70 lbs/day and 5.42 tons/yr from this emissions unit.  See b)(2)a. below.
b.	OAC rule 3745-21-07(G)	This emissions unit is exempt from the emission limitation/control requirements contained in OAC rule 3745-21-07(G) because no photochemically reactive materials are employed. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid MACT)	See b)(2)c. and c)(1) below.

(2) Additional Terms and Conditions

a. The daily emission limitation for this emissions unit was established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

b. The OC emission limitation of no photochemically reactive materials (i.e., as raw materials or cleanup materials) be employed in this emissions unit shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds.

c. The emissions of individual hazardous air pollutants (Individual HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons



per year, based upon a rolling, 12-month summation of the individual HAP emissions.

The emissions of combined hazardous air pollutants (HAP) from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation of the combined HAP emissions.

A listing of the HAPs can be found in Section 112(b) of the Clear Air Act can be obtained by contacting your Ohio EPA field office or local air agency contact.

c) Operational Restrictions

- (1) The permittee shall not exceed 119,712,096 pounds of rubber throughput from emissions units P005 through P014, P019, and P020, per year based on a rolling 12-month summation of throughput figures. The facility has existing records to demonstrate compliance with the operational restriction, therefore, a monthly schedule of throughput restriction is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on monthly basis for the purpose of determining annual OC emissions:
  - a. the type and amount (in tons) of rubber processed in this emissions unit;
  - b. the number of gallons of mold release employed in this emissions unit;
  - c. the OC content of the mold release, in pounds per gallon;
  - d. the total OC emissions from the rubber processed and mold release employed combined, calculated as follows:
 

[(the total amount of rubber processed in emissions units P005 through P014, P019, and P020) x (the appropriate Draft AP-42 Rubber Manufacturers Association (RMA) emission factor, Table 4.12-8 for platen press curing, July 1999)] + [(the total amount of mold release employed by emissions units P005 through P014, P019 and P020) x (actual OC content of the mold release)] x [percent production associated with P020]
  - e. the annual OC emissions for this emissions unit, as a monthly summation of d)(1)d. above.
- (2) The permittee shall collect and record the following records on a monthly basis to document compliance with emissions limitations for emission units P005 through P014, P019, and P020 for the purpose of determining HAP emissions:
  - a. the company identification for each uncured rubber, fabric material, and mold release employed;
  - b. the number of pounds of uncured rubber and fabric material employed;
  - c. the number of gallons of mold release employed;



- d. the number of pounds of rubber throughput (finished product);
- e. the calculated individual HAP emissions for the current month, in pounds or tons;
- f. the calculated total combined HAP emissions for the current month, in pounds or tons;
- g. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months); and
- h. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months).
- i. the rolling 12-month summation of rubber throughput in pounds per year (i.e., the total lbs. or rubber throughput from the current month added to the summation of the total rubber throughput from the previous 11 months).

e) Reporting Requirements

- (1) The permittee shall submit annual reports by April 15<sup>th</sup> which specify the total OC emissions from this emissions unit and the total for emissions units P005 through P015 for the previous calendar year. The report requirement may be satisfied by including this emissions unit in the annual Fee Emission Report.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. as determined by recordkeeping in d)(2)g. above, an exceedance of the rolling 12-month summation of Individual HAP emissions;
  - b. as determined by recordkeeping in d)(2)h. above, an exceedance of the rolling 12-month summation of total combined HAP emissions; and
  - c. as determined by recordkeeping in d)(2)i. above, an exceedance of the rolling 12-month summation of rubber throughput.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
OC emissions shall not exceed 29.70 lbs/day from this emissions unit.
  - Applicable Compliance Method:



Compliance may be demonstrated by multiplying the maximum amount of rubber processed per day (16,874 lbs/day) by the highest Draft AP-42 emission factor (Table 4.12, July 31, 1999) for the types of rubber used in this emission unit (maximum of 0.00175 lb OC/lb rubber). The rubber emissions shall be added to the daily emissions from mold release (maximum usage of mold release multiplied by the mold release OC content) to obtain the total maximum daily emissions, in pounds.

b. Emission Limitation:

OC emissions shall not exceed 5.42 tons/yr from this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated through the records required pursuant to d)(1)e. of this permit.

c. Emission Limitation:

Emissions of Individual HAP from emissions units P005 through P014, P019, and P020 shall not exceed 9.7 tons per year, based upon a rolling, 12-month summation. Emissions of total combined HAP from emissions units P005 through P014, P019, and P020 shall not exceed 21.6 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping requirements specified in d)(2) above.

- (2) Formulation data or USEPA Method 24 shall be used to determine the OC content of the mold release.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
- (2) The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 01-08929 issued on 3/31/05.