State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

12/11/2008

Certified Mail
Facility ID: 1667000003
Permit Number: P0101904
County: Portage

GARY BERNARDO
Trelleborg Wheel Systems Americas, Inc.
61 STATE ROUTE 43 N
HARTVILLE, OH 44632-0430

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 6/11/2008. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Akron Regional Air Quality Management District

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PRELIMINARY PROPOSED

Air Pollution Title V Permit

for

Trelleborg Wheel Systems Americas, Inc.

Facility ID: 1667000003
Permit Number: P0101904
Permit Type: Renewal
Issued: 12/11/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Title V Permit
for
Trelleborg Wheel Systems Americas, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 6
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 8
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 10
15. Operational Flexibility 10
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 12
22. Permanent Shutdown of an Emissions Unit 12
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 13
25. Records Retention Requirements Under State Law Only 13
26. Inspections and Information Requests 13
27. Scheduled Maintenance/Malfunction Reporting 14
28. Permit Transfers 14

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 14

B. Facility-Wide Terms and Conditions 15

C. Emissions Unit Terms and Conditions 17

1. K001, SPRAY BOOTH 18
2. K003, SPRAY BOOTH 23
3. K005, SPRAY BOOTH 29
4. K008, SPRAY BOOTH 35
5. K009, SPRAY BOOTH 40
6. K011, SPRAY BOOTH 45
7. P010, K-7 Mixer 51
8. P019, Polyurethane Tire Molding 55
9. P020, Banbury Mixer 58

Authorization

Facility ID: 1667000003
Facility Description: Tires and Inner Tubes.
Application Number(s): A0033716
Permit Number: P0101904
Permit Description: Title V permit for a tire and wheel manufacturing facility
Permit Type: Renewal
Issue Date: 12/11/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Trelleborg Wheel Systems Americas, Inc.
61 STATE ROUTE 43 N
HARTVILLE, OH 44632-0430

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Akron Regional Air Quality Management District.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee

shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the

Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as

soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports

pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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) 2.

   The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

   B005 NORTH AM. GAS FIRED BOILER NO.1, NB-7438
   B006 NORTH AM. GAS FIRED BOILER NO. 2, NB-7437
   B007 CLEAVER BROOKS GAS FIRED BOILER NO. 8, L-58510
   B008 CLEAVER BROOKS GAS FIRED BOILER NO. 5, L-53744
   B009 CLEAVER BROOKS GAS FIRED BOILER NO. 6, L-53745
   B010 NORTH AMERICAN GAS FIRED BOILER NO. 4, NB-8807
   B011 NORTH AMERICAN GAS FIRED BOILER NO. 3, NB-8808
   B012 NORTH AMERICAN GAS FIRED BOILER NO. 7, NB-5211
   P001 UTRISONIC MOLD CLEANING
   P006 LABORATORY CLEANER - ULTRASONIC CLEANER-TEST
   P007 CURE TEST OVEN
   P008 HORIZONTAL FLAMMABILITY TESTING.
   P011 WELDERS, WELDING SHOP
   P012 RUBBER MILL FOR LABORATORY
   P013 RUBBER MILL FOR LABORATORY TEST CHAMBER
   P016 PAINT MIXING ROOM FOR MIXING OF PAINT AND SOLVENT
   P017 PANGBORN ROTOBLAST RIM PREP. AREA
   Z001 LABORATORY SPRAY BOOTH - COATING R&D TESTING
   Z002 Detroit, Model PTA-15D-50, Distillate Fuel Fired 180 HP Firefighting pump #1 A
   Z003 Cummins, Model N-855-F, Distillate Fuel Fired 190 HP Firefighting pump #2 A

C. Emissions Unit Terms and Conditions

1. K001, SPRAY BOOTH

Operations, Property and/or Equipment Description:

Manual spray booth used for the application of paint to molded industrial tires.

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 3745-17-07(A)	See b)(2)b below.
b.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
c.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
d.	40 CFR Part 63, Subpart MMMM	See b)(2)c below.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	See the General Provisions in Sections 63.1 through 63.15 in Appendix B, in Subpart MMMM of 40 CFR Part 63.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

c. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3890(b)	Organic HAP emissions limit for existing source
63.3891(a)	Options for meeting emission limits – Compliant Coatings

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system to control PE whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3892(a)	No operating limits - compliant coatings
63.3893(a)	No work practice standards – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(A) (1) and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each day for the coating line:

a. The name and identification number of each coating employed.

b. The VOC content (in pounds VOC/gallon of coating, excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily, volume-weighted average VOC content of all the coatings, as applied, in pounds VOC/gallon of coating, excluding water and exempt solvents, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

e. Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3930	Recordkeeping Requirements
63.3931	Recordkeeping retention and availability

[Authority for term: OAC rule 3745-77-07(C) (1), and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

Section:	Requirement:
63.3910	notifications submittal
63.3920	reporting requirements

[Authority for term: OAC rule 3745-77-07(C) (1) and 30 CFR Part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. **Emissions Limitation:**

3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall based upon the record keeping requirements specified in Section d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. **Emission Limitation:**

0.551 lb of PE per hour

c. **Applicable Compliance Method:**

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B) (10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. **Emission Limitation:**

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible PE limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B) (1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rule 3745-21-04(B)(5) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3940	Initial compliance demonstration

63.3941	Demonstration compliance with the emission limitations
63.3942	Demonstration of continuous compliance

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

2. K003, SPRAY BOOTH

Operations, Property and/or Equipment Description:

Manual spray booth used for the application of adhesive to metal rims used for molded rubber tires.

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) PTI # 16-02288 PTI # 16-128	Volatile organic compound (VOC) emissions shall not exceed 7.71 pounds per hour Particulate emissions (PE) shall not exceed 0.88 pound per hour, and 2.5 tons PE per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) (1), 3745-21-09(U) (1) (c), and 3745-31-05(D). See b)(2)a below.
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)b below.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	See b)(2)d below.
e	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 15.0 tons per rolling, 12-month summation. See b)(2)c, and c)(1) below.
f.	40 CFR 63 Subpart MMMM	See b)(2)e below.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	See the General Provisions in Sections. 63.1 through 63.15, Appendix B of 40 CFR, Part 63, Subpart MMMM

(2) Additional Terms and Conditions

a. The hourly VOC and PE limitations were developed based on the potentials to emit at the maximum coatings application rate for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements is necessary to ensure compliance with these limitations.

b. The permittee shall not employ coatings with a VOC content that exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily, volume-weighted average).

c. The total annual VOC emissions from this emissions unit shall not exceed 15.0 tons per rolling 12-month period. To ensure this limit can be met, the permittee has committed to comply with the usage restrictions listed in Section c) of this permit.

d. The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A) (3).

e. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3890(b)	Organic HAP emissions limit for existing source
63.3891(a)	Options for meeting emission limits – Compliant Coatings

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in this emissions is limited by the following equation:

$$\sum_{M=1}^{12}\left(\sum_{n=1}^{n}\left((\mathrm{Vi})(\mathrm{Gi})\right) \div 2000\,\frac{\mathrm{lbs}}{\mathrm{ton}}\right) \leq\ 15.0\,\frac{\mathrm{tons}}{\mathrm{year}}$$

Where,

M = the increment of the rolling 12-month period;

V_i = OC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3892(a)	No operating limits - compliant coatings
63.3893(a)	No work practice standards – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(A) (1) and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the line:

a. the name and identification number of each coating, as applied;

b. the VOC content (in pounds VOC/gallon of coating, excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information on a monthly basis for this emissions unit :

a. the name and identification of each coating employed;

b. the VOC content of each of coating employed, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the VOC content of each of cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the number of gallons of each type of cleanup material drummed for shipment off-site;

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content); and

i. the rolling, 12-month VOC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3930	Recordkeeping Requirements
63.3931	Recordkeeping retention and availability

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (Akron Regional AQMD) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify all exceedances of the rolling, 12 month VOC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

Section:	Requirement:
63.3910	notifications submittal
63.3920	reporting requirements

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the emission limitation in these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation:**

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

7.71 pounds VOC/ hr.
15.0 tons VOC / per rolling ,12-month period.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be based on the daily and monthly records required in section d. of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.88 pound/ hr PE
2.5 tons PE/ yr

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

PE = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment.

Compliance with the annual PE limitation shall be based upon the following formula:

$$A = Sc\ x\ (1 - TE)x(1 - CE)x\ 1\frac{ton}{2000}lbs\ x\ 8760\frac{hrs}{year}$$

Where:

A = The Annual OC emissions in tons per year

S_c = The Solids content in lbs solids per gallon of coating employed

T_E = The transfer efficiency of the coating line

C_E = The control efficiency of the control equipment

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitations in OAC rule 3745-17-07(A) (1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3940	Initial compliance demonstration
63.3941	Demonstration compliance with the emission limitations
63.3942	Demonstration of continuous compliance

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) The best available technology (BAT) determination for PTI #16-128 was determined to be compliance with the requirements of OAC rule 3745-21-07(G), although this was not explicitly stated in the permit to install terms and conditions.

U.S. EPA did not agree with this determination. The U.S. EPA decided this emissions unit is subject to OAC 3745-21-09(U). PTI 16-128 was superseded by PTI 16-02288 to correct the discrepancy.

3. K005, SPRAY BOOTH

Operations, Property and/or Equipment Description:

Manual spray booth used for the application of adhesive to metal rims used for molded rubber tires.

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) PTI # 16-02288 PTI # 16-141	Volatile organic compound (VOC) emissions shall not exceed 13.1 pounds per hour, and 15.0 tons per year. Particulate emissions (PE) shall not exceed 0.88 pound per hour, and 2.5 tons PE per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) (1), 3745-21-09(U) (1) (c), and 3745-31-05(D). See A.I.2.a below
b.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	See b)(2)d. below.
e.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 15.0 tons per yr, based on a rolling, 12-month summation. See b)(2)c, and c)(2) below.
f.	40 CFR 63 Subpart MMMM	See b)(3) below.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	See the General Provisions in Sections. 63.1 through 63.15, Appendix B of 40 CFR, Part 63, Subpart MMMM

(2) Additional Terms and Conditions

a. The hourly VOC and PE limitations were developed based on the potentials to emit at the maximum coatings application rate for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements is necessary to ensure compliance with these limitations.

b. The permittee shall not employ any coatings with a VOC content that exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average).

c. The total annual VOC emissions from this emissions unit shall not exceed 15.0 tons per rolling 12-month period. To ensure this limit can be met, the permittee has committed to comply with the usage restrictions listed in Section c) of this permit.

d. The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A) (3).

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3890(b)	Organic HAP emissions limit for existing source
63.3891(a)	Options for meeting emission limits – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(C) (1)]

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in this emissions is limited by the following equation:

$$\sum_{M=1}^{12}\left(\sum_{n=1}^{n}\left((\mathrm{Vi})(\mathrm{Gi})\right) \div 2000\,\frac{\mathrm{lbs}}{\mathrm{ton}}\right) \leq\ 15.0\,\frac{\mathrm{tons}}{\mathrm{year}}$$

Where,

M = the increment of the rolling 12-month period;

V_i = OC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3892(a)	No operating limits - compliant coatings
63.3893(a)	No work practice standards – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(A) (1) and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the line:

a. the name and identification number of each coating, as applied;

b. the VOC content (in pounds VOC/gallon of coating, excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information on a monthly basis for this emissions unit :

a. the name and identification of each coating employed;

b. the VOC content of each of coating employed, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the VOC content of each of cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the number of gallons of each type of cleanup material drummed for shipment off-site.

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content); and

i. the rolling, 12-month VOC emissions, in tons. s.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3930	Recordkeeping Requirements
63.3931	Recordkeeping retention and availability

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (Akron Regional AQMD) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify all exceedances of the rolling, 12 month VOC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

Section:	Requirement:
63.3910	notifications submittal
63.3920	reporting requirements

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the emission limitation in these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation:**

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d) of this permit.
[Authority for term: OAC rule 3745-77-07(C)(1)]

b. **Emission Limitations:**

7.71 pounds VOC/ hr and15.0 tons VOC / per rolling ,12-month period

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be based on the daily and monthly records required in section d. of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.88 pound/ hr PE
2.5 tons PE/ yr

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

PE = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment.

Compliance with the annual PE limitation shall be based upon the following formula:

$$A = Sc\ x\ (1 - TE)x(1 - CE)x\ 1\frac{ton}{2000}lbs\ x\ 8760\frac{hrs}{year}$$

Where:

A = The Annual OC emissions in tons per year

S_c = The Solids content in lbs solids per gallon of coating employed

T_E = The transfer efficiency of the coating line

C_E = The control efficiency of the control equipment

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitations in OAC rule 3745-17-07(A) (1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).
[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3940	Initial compliance demonstration
63.3941	Demonstration compliance with the emission limitations
63.3942	Demonstration of continuous compliance

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) The best available technology (BAT) determination for PTI #16-128 was determined to be compliance with the requirements of OAC rule 3745-21-07(G), although this was not explicitly stated in the permit to install terms and conditions.

(2) U.S. EPA did not agree with this determination. The U.S. EPA decided this emissions unit is subject to OAC 3745-21-09(U). PTI 16-128 was superseded by PTI 16-02288 to correct the discrepancy.

4. K008, SPRAY BOOTH

[same as K001]

Operations, Property and/or Equipment Description:

Manual spray booth used for the application of paint to molded industrial tires.

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 3745-17-07(A)	See b)(2)b below.
b.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
c.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
d.	40 CFR Part 63, Subpart MMMM	See b)(2)c below.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	See the General Provisions in Sections 63.1 through 63.15 in Appendix B, in Subpart MMMM of 40 CFR Part 63.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

c. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3890(b)	Organic HAP emissions limit for existing source
63.3891(a)	Options for meeting emission limits – Compliant Coatings

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system to control PE whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3892(a)	No operating limits - compliant coatings
63.3893(a)	No work practice standards – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(A) (1) and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each day for the coating line:

a. The name and identification number of each coating employed.

b. The VOC content (in pounds VOC/gallon of coating, excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily, volume-weighted average VOC content of all the coatings, as applied, in pounds VOC/gallon of coating, excluding water and exempt solvents, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

e. Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:

63.3930	Recordkeeping Requirements
63.3931	Recordkeeping retention and availability

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

Section:	Requirement:
63.3910	notifications submittal
63.3920	reporting requirements

[Authority for term: OAC rule 3745-77-07(C) (1) and 30 CFR Part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. **Emissions Limitation:**

3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall based upon the record keeping requirements specified in Section d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. **Emission Limitation:**

0.551 lb of PE per hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B) (10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. **Emission Limitation:**

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible PE limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B) (1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3940	Initial compliance demonstration
63.3941	Demonstration compliance with the emission limitations
63.3942	Demonstration of continuous compliance

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

5. K009, SPRAY BOOTH

Operations, Property and/or Equipment Description:

Manual spray booth used for the application of paint to molded industrial tires.

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 3745-17-07(A)	See b)(2)b below.
b.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
c.	OAC rule 3745-21-09(U)(1)	See b)(2)a below.
d.	40 CFR Part 63, Subpart MMMM	See b)(2)c below.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	See the General Provisions in Sections 63.1 through 63.15 in Appendix B, in Subpart MMMM of 40 CFR Part 63.

(2) Additional Terms and Conditions

a. The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

b. Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

c. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3890(b)	Organic HAP emissions limit for existing source
63.3891(a)	Options for meeting emission limits – Compliant Coatings

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system to control PE whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3892(a)	No operating limits - compliant coatings
63.3893(a)	No work practice standards – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(A) (1) and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each day for the coating line:

a. The name and identification number of each coating employed.

b. The VOC content (in pounds VOC/gallon of coating, excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily, volume-weighted average VOC content of all the coatings, as applied, in pounds VOC/gallon of coating, excluding water and exempt solvents, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

e. Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

[Authority for term: OAC rules OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3930	Recordkeeping Requirements
63.3931	Recordkeeping retention and availability

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

Section:	Requirement:
63.3910	notifications submittal
63.3920	reporting requirements

[Authority for term: OAC rule 3745-77-07(C) (1) and 30 CFR Part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. **Emissions Limitation:**

3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall based upon the record keeping requirements specified in Section d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. **Emission Limitation:**

0.551 lb of PE per hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emission limitation pursuant to OAC rule 3745-17-03(B) (10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. **Emission Limitation:**

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

When requested by the Ohio EPA, compliance with the above visible PE limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B) (1) using the methods and procedures specified in USEPA Reference Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3940	Initial compliance demonstration

63.3941	Demonstration compliance with the emission limitations
63.3942	Demonstration of continuous compliance

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) None.

6. K011, SPRAY BOOTH

Operations, Property and/or Equipment Description:

Automatic line with two spray booths used for the application of adhesive to metal rims used for molded rubber tires.

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) PTI # 16-02288 PTI # 16-128	Volatile organic compound (VOC) emissions shall not exceed 7.71 pounds per hour, and 15.0 tons per year. Particulate emissions (PE) shall not exceed 0.88 pound per hour, and 2.5 tons PE per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) (1), 3745-21-09(U) (1) (c), and 3745-31-05(C). See 3.b) (2)a. below.
b.	OAC rule 3745-21-09(U)(1)(c)	See 3.b) (2)b. below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	See 3.b) (2) d. below.
e.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 15.0 tons per rolling, 12-month summation. See 3.b) (2) c, and c) (2) below.
f.	40 CFR 63 Subpart MMMM	See 3.b) (3) below.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Appendix B to Subpart MMMM of Part 63 shows which parts of the General Provisions in Sec. Sec. 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. The hourly VOC and PE limitations were developed based on the potentials to emit at the maximum coatings application rate for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements is necessary to ensure compliance with these limitations.

b. The permittee shall not employ coatings with a VOC content that exceeds 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily, volume-weighted average).

c. The total annual VOC emissions from this emissions unit shall not exceed 15.0 tons per rolling, 12-month period. To ensure this limit can be met, the permittee has committed to comply with the usage restrictions listed in Section c) of this permit.

d. The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A) (3).

e. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3890(b)	Organic HAP emissions limit for existing source
63.3891(a)	Options for meeting emission limits – Compliant Coatings

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in this emissions is limited by the following equation:

$$\sum_{M=1}^{12}\left(\sum_{n=1}^{n}\left((\mathrm{Vi})(\mathrm{Gi})\right) \div 2000\,\frac{\mathrm{lbs}}{\mathrm{ton}}\right) \leq\ 15.0\,\frac{\mathrm{tons}}{\mathrm{year}}$$

where,

M = the increment of the rolling 12-month period;

V_i = OC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3892(a)	No operating limits - compliant coatings
63.3893(a)	No work practice standards – Compliant Coatings

[Authority for term: OAC rule 3745-77-07(A) (1) and 40 CFR Part 63, Subpart MMMM]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the line:

a. the name and identification number of each coating, as applied;

b. the VOC content (in pounds VOC/gallon of coating, excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information on a monthly basis for this emissions unit :

a. the name and identification of each coating employed;

b. the VOC content of each of coating employed, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the VOC content of each of cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the number of gallons of each type of cleanup material drummed for shipment off-site;

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., the sum of all coatings and cleanup materials times the respective VOC contents minus the amount of cleanup material drummed for shipment off-site, in pounds or tons (number of gallons of cleanup times the respective VOC content); and

i. the rolling, 12-month VOC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3930	Recordkeeping Requirements
63.3931	Recordkeeping retention and availability

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR Part 63, Subpart MMMM]

e) Reporting Requirements

(1) The permittee shall notify the Director (Akron Regional AQMD) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)]

The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify all exceedances of the rolling, 12 month VOC emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart MMMM, per the following sections:

Section:	Requirement:
63.3910	notifications submittal
63.3920	reporting requirements

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR part 63, Subpart MMMM]

f) Testing Requirements

(1) Compliance with the emission limitation in these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation:**

3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d) of this permit.
[Authority for term: OAC rule 3745-77-07(C)(1)]

b. **Emission Limitations:**
7.71 pounds VOC/ hr.
15.0 tons VOC / per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation above shall be based on the daily and monthly records required in section d. of this permit.
[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.88 pound/ hr PE
2.5 tons PE/ yr

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

PE = maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment.

Compliance with the annual PE limitation shall be based upon the following formula:

$$A = Sc\ x\ (1 - TE)x(1 - CE)x\ 1\frac{ton}{2000}lbs\ x\ 8760\frac{hrs}{year}$$

Where:

A = The Annual OC emissions in tons per year

S_c = The Solids content in lbs solids per gallon of coating employed

T_E = The transfer efficiency of the coating line

C_E = The control efficiency of the control equipment

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitations in OAC rule 3745-17-07(A) (1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

Section:	Requirement:
63.3940	Initial compliance demonstration
63.3941	Demonstration compliance with the emission limitations
63.3942	Demonstration of continuous compliance

[Authority for term: OAC rule 3745-77-07(C) (1) and 40 CFR part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) The best available technology (BAT) determination for PTI #16-128 was determined to be compliance with the requirements of OAC rule 3745-21-07(G), although this was not explicitly stated in the permit to install terms and conditions.

(2) U.S. EPA did not agree with this determination. The U.S. EPA decided this emissions unit is subject to OAC 3745-21-09(U). PTI 16-128 was superseded by PTI 16-02288 to correct the discrepancy.

7. P010, K-7 Mixer

Operations, Property and/or Equipment Description:

Adanson - United K-7 Mixer used for rubber compounding

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 3745-21-07(G)	None [see b)(2)b].
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
d.	40 CFR Part 63, Subpart XXXX	See b)(2)c.

(2) Additional Terms and Conditions

a. The visible PE limitation shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

b. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.

c. The equipment covered by this permit is included in the rubber processing affected source of this regulation, however paragraph 63.5982(b)(4) of 40 CFR part 63, Subpart XXXX states there are no emission limitations or other requirements for the rubber processing affected source. See Part 2.A.28.b of this permit.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C) (1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s). The acceptable pressure drop shall be based upon the manufacturer=s specifications until such time as any required emission testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by

the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. an identification of each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation:**

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation above shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

b. **Emission Limitation:**

0.551 lb PE/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods and procedures required by 40 CFR Part 60, Appendix A, Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

8. P019, Polyurethane Tire Molding

Operations, Property and/or Equipment Description:

MIXING AND METERING EQUIPMENT - POLYURETHANES TIRES

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) PTI # 16-1352	6.0 pounds per hour of methylene chloride (non-photochemically reactive chlorinated solvent)
b.	OAC rule 3745-21-07(G)	See b)(2)a and c)(1) below.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	0.771 pound per hour of PE

(2) Additional Terms and Conditions

a. The control measures/requirements established pursuant to OAC rule 3745-21-07(G) shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current rule as a revision to the Ohio SIP for the control of organic compounds.

c) Operational Restrictions

(1) The permittee shall not employ any coating, adhesive, or cleanup material that is a photochemically reactive material, as defined in OAC rule 3745-21-01(C) (5), in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for the coating line on a monthly basis:

a. the name and identification number of each coating, adhesive, and cleanup material employed; and

b. documentation on whether or not each coating, adhesive, and cleanup material is a photochemically reactive material.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each day for this emissions unit:

a. the amount of methylene chloride used, in gallons;

b. the number of hours this emissions unit was in operation; and

c. the average hourly methylene chloride emission rate, i.e., (a) (11)/ (b), in pounds per hour (average), where 11 denotes the density of methylene chloride (pounds per gallon of methylene chloride).

[Authority for term: OAC rule 3745-77-07(C) (1)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record as well as the actual organic compound emissions for each day that the record indicates a photochemically reactive material was employed. These reports shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which include an identification of each day during which the average hourly methylene chloride emissions exceeded 6.0 pounds per hour, and the actual average hourly methylene chloride emissions for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.771 pound per hour of PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above based on the results of future testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

a. **Emission Limitation:**

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitations in OAC rule 3745-17-07(A) (1) shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. **Emission Limitation:**

6.0 pounds per hour of methylene chloride

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable methylene chloride emission limitation in accordance with the record keeping requirements established in section d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

[Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

9. P020, Banbury Mixer

Operations, Property and/or Equipment Description:

Banbury Mixer used for rubber compounding

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) PTI 16-02271	1.25 pounds per hour of particulate emissions (PE) 5.5 tons per year of PE; 1.18 pounds per hour of organic compounds (OC) 5.2 tons per year of OC*. * Includes individual HAPs all less than 1.0 ton per year. See b)(2)a.
b.	OAC rule 3745-21-07(G)	See b)(2)c below.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)d. below.
d.	OAC rule 3745-17-11(B)(1)	See b) (2)d. below.
e.	40 CFR Part 63, Subpart XXXX	See b)(3) below.

(2) Additional Terms and Conditions

a. The permittee shall employ equipment (e.g., hoods) to capture and vent particulate emissions to the baghouse/fabric filter. The control equipment outlet shall achieve an emission rate of not greater than 0.030 grain per dry standard cubic foot of exhaust gases or there are no visible emissions whichever is less stringent.

b. The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no hourly monitoring, record

keeping, or reporting requirements are necessary to ensure compliance with this limit.

c. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A) (3).

e. The equipment covered by this permit is included in the rubber processing affected source of this regulation, however paragraph 63.5982(b)(4) of 40 CFR part 63, Subpart XXXX states there are no emission limitations or other requirements for the rubber processing affected source. See Part 2.A.28.b of this permit.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C) (1)]

(2) The pressure drop across the baghouse shall be maintained within the range of 2.0 to 5.0 inches of water while the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C) (1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by this permit;

b. an identification of each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

[Authority for term: OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

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

Applicable Compliance Method:

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

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

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

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

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

c. Applicable Compliance Method:

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

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

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

d. Emission Limitation:

0.030 grain / dscf or no visible emissions

Applicable Compliance Method:

Compliance with the visible emission limitations shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

If required, compliance with the grain loading shall be determined based testing conducted in accordance with the methods and procedures in 40 CFR Part 60, Appendix A, Methods 1-5.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

no visible emissions

Applicable Compliance Method:

If required, compliance with the visible emission limitation above shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B) (1).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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.