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Facility Name: **Michelin North America, Inc.**

Application Number: **16-1781**

Date: **July 15, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Michelin North America, Inc.** located in **Summit** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P001 (Mod)	Modification of specialty tire manufacturing - addition of curing presses.	See additional Special Terms and Conditions. Compliance with Ohio EPA "Air Toxics Policy."	3745-31-05 3745-21-09 (x)	192 lbs. per day VOC 35.0 TPY VOC

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	35.0

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308 .**

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

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The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C) (5).

B. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis:

- a. the number of tires produced;
- b. the name and identification number of each coating and solvent employed;
- c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents, of each coating and solvent employed;
- d. the total number of gallons of each coating and solvent employed;
- e. the number of days the emission unit was in operation;
- f. the calculated average daily VOC emission rate from tire curing, i.e. $(a) * (0.01 \text{ lb VOC/tire produced}) / e$, in pounds of VOC per day (average);
- g. the calculated average daily VOC emission rate from coatings and solvents, i.e. $(c) * (d) / (e)$, in pounds of VOC per day (average); and

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h. the total VOC emission rate from tire production per day, i.e. (f) + (g), in pounds of VOC per day (average).

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average daily VOC emissions from all coatings and solvents exceeded the allowable daily mass emission rate, and the actual (average) daily VOC emission rate.

2. 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 Akron Air Pollution Control; and,
- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Air Pollution Control. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The

reports shall be submitted quarterly, i.e., 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

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3745-15-06.)

D. Testing Requirements

1. Compliance with the emission limitations in Permit to Install 16-1781 shall be determined in accordance with the following methods:

a. Emission Limitation:

192.0 lbs/day VOC

35.0 TPY VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section B.1 of these T&Cs.

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

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

E. Miscellaneous Requirements

1. This permit allows the use of the coatings and solvents specified by the permittee in the application for PTI number 16-1781. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the hexane and toluene emission limitations specified in

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this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and solvent formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 0.8295

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 144.6

**Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m³):
4,190**

Pollutant: toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 0.8295

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 144.6

**Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m³):
4,476**

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Akron Air Pollution

Control are required, including the possible issuance of modifications to PTI number 16-1481 and the operating permit:

- a. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, that would result in the emission of a compound

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with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or solvents, or use of new coatings or solvents, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
- e. any change in the composition of the coatings or solvents, or use of new coatings or solvents, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).