Facility ID: 0228000039 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Facility ID: 0228000039 Emissions Unit ID: P007 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Elastomeric Internal Rubber Mixer	OAC rule 3745-17-07 (A)	The emissions limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-11	The emissions limit based upon this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07 (G)(2)	OC emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See section A.2.a of these terms and conditions.
	OAC rule 3745-31-05 (A) PTI No. 02-14966	Particulate emissions from this emissions unit shall not exceed 1.58 lbs per hour and 6.92 tons per year. Visible particulate emissions from the stack of dust collector shall not exceed five percent (5%) opacity as a 6-minute average. Organic Compound (OC) emissions from this emissions unit shall not exceed 7.30 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07 (G)(2).

2. **Additional Terms and Conditions**

   (a) This emissions unit becomes subject to OAC 3745-21-07(G)(2) on any day when any photochemically reactive material is employed.

B. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

2. The permittee shall keep the following records each day for this emissions unit:

   a. The name and identification of each material employed in this emissions unit and its physical state.

   b. For each liquid organic material, an indication of whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5).

   c. The total amount of each material employed in this emissions unit, defined as "Wm", in unit of pounds per

day.

d. The total daily OC emissions, defined as OCd, from this emissions unit, in pounds per day. The OCd shall be calculated by the following equation:

OCd = the sum, from i = 1 to i = n, of (Wm)i, times EF

where,
EF = worst case emissions factor, 4.44 X 10-4 pound OC emissions per pound of raw materials input, from AP - 42, June 1999, section 4.12, Manufacture of Rubber Products.
i = subscript denoting an individual material; and
n = the total number of different materials

e. For each day during which a photochemically reactive material is employed, the total number of hours this emissions unit was in operation, "OT", in hours per day.

f. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate, in pounds per hour, to be defined as "OCh" and calculated as follows:

OCh = (OCd)/(OT)

3. For each day during which a photochemically reactive material is employed, the permittee shall keep the following records each day for this emissions unit:

a. The total amount of each material employed in this emissions unit, defined as "Wm", in unit of pounds per day.

b. The total daily OC emissions, defined as OCd, from this emissions unit, in pounds per day. The OCd shall be calculated by the following equation:

OCd = the sum, from i = 1 to i = n, of (Wm)i, times EF

where,
EF = worst case emissions factor, 4.44 X 10-4 pound OC emissions per pound of raw materials input, from AP - 42, June 1999, section 4.12, Manufacture of Rubber Products.
i = subscript denoting an individual material; and
n = the total number of different materials

c. For each day during which a photochemically reactive material is employed, the total number of hours this emissions unit was in operation, "OT", in hours per day.

d. For each day during which a photochemically reactive material is employed, the average hourly OC emission rate, in pounds per hour, to be defined as "OCh" and calculated as follows:

OCh = (OCd)/(OT)

4. The permit to install for this emissions unit (P007) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

a. Pollutant: Carbon Disulfide

TLV (mg/m3): 31.1411

Maximum Hourly Emission Rate (lbs/hr): 0.3410

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15.68

MAGLC (ug/m3): 741.4549

b. Pollutant: Hexane

TLV (mg/m3): 176.2312

Maximum Hourly Emission Rate (lbs/hr): 0.3741

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.20

MAGLC (ug/m3): 4196.1243

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound 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 previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from this emissions unit exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.

b. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from this emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day.

c. An identification of all periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified in B.1 of these terms and conditions.

2. All deviation (excursion) reports shall be submitted in accordance with section A.2 of the General Terms and Conditions.

E. **Testing Requirements**

1. Compliance with the allowable emission limits in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
5% opacity as a 6-minute average from the stack

Applicable Compliance Method:
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the test methods and procedures specified in U. S. EPA Reference Method 9.

b. Emission Limitation:
1.58 lbs/hr of PE

Applicable Compliance Method:
Compliance shall be determined by particulate emission tests performed in accordance with OAC rule 3745-17-03 (B)(10) using the methods and procedures specified in U. S. EPA Reference Methods 1 - 5, if required by Ohio EPA.

c. Emission Limitation:
8 lbs/hr and 40 pounds per day of OC

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section C.3 of these terms and conditions.

d. Emission Limitation:
6.92 tons/yr of PE

Applicable Compliance Method:
The tons per year limitations were developed by multiplying the pounds per hour limitations by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

e. Emission Limitation:
7.30 tons/yr of OC

Applicable Compliance Method:
Compliance shall be determined based upon record keeping requirements specified in section C.3 of these terms and conditions and shall be the sum of daily OC emission rate for the previous calendar year.

F. **Miscellaneous Requirements**

1. None