



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

10/6/2010

Tom Brennan  
Valley Rubber Mixing  
520 South Main Street Suite 2445  
Akron, OH 44311

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677011064  
Permit Number: P0106834  
Permit Type: Renewal  
County: Summit

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Valley Rubber Mixing**

Facility ID: 1677011064  
Permit Number: P0106834  
Permit Type: Renewal  
Issued: 10/6/2010  
Effective: 10/6/2010  
Expiration: 10/6/2015





Division of Air Pollution Control
Permit-to-Install and Operate
for
Valley Rubber Mixing

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## Authorization

Facility ID: 1677011064  
Application Number(s): A0040188  
Permit Number: P0106834  
Permit Description: PTIO renewal for emissions units P901, P902, P903, P904, and P905.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 10/6/2010  
Effective Date: 10/6/2010  
Expiration Date: 10/6/2015  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Valley Rubber Mixing  
520 S. MAIN ST  
Akron, OH 44311

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

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

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0106834  
Permit Description: PTIO renewal for emissions units P901, P902, P903, P904, and P905.

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

**Emissions Unit ID: P904**  
Company Equipment ID: Mill E - 60"  
Superseded Permit Number: 16-1546  
General Permit Category and Type: Not Applicable

**Group Name: Group 1**

<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	Mill A - 60"
Superseded Permit Number:	16-1518
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P902</b>
Company Equipment ID:	Mill B - 84"
Superseded Permit Number:	16-1518
General Permit Category and Type:	Not Applicable

**Group Name: Group 2**

<b>Emissions Unit ID:</b>	<b>P903</b>
Company Equipment ID:	Mill C - 84"
Superseded Permit Number:	16-1518
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P905</b>
Company Equipment ID:	Banbury F
Superseded Permit Number:	16-1546
General Permit Category and Type:	Not Applicable

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

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

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

**Final Permit-to-Install and Operate**

Valley Rubber Mixing

**Permit Number:** P0106834

**Facility ID:** 1677011064

**Effective Date:** 10/6/2010

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

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

**1. P904, Mill E - 60"**

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

60" two roll mill - Mill E

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. 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. b)(1)b., d)(1), e)(1), and f)(1)e.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The particulate emissions (PE) shall not exceed 0.5 pound of per hour.  The organic compounds (OC) emissions shall not exceed 35.0 pounds of per hour.
b.	OAC rule 3745-31-05(D)	The emissions of OC from this emissions unit shall not exceed 10.5 tons per year based upon a rolling, 12-month summation of the monthly emissions.
c.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08	The permittee shall employ equipment (e.g., hoods) to capture and vent PE to a fabric filter/baghouse.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-21-07(G)(2)	See c)(1) and b)(2)a. below.

(2) Additional Terms and Conditions

- a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)g., c)(1), d)(2), and e)(3).

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the total pounds of compound produced;
  - b. the total pounds of the high VOC compound produced;
  - c. the amount of OC emitted; and
  - d. the rolling 12-month summation of the monthly OC emissions.
- (2) The permittee shall collect and record the following information for this emissions unit:
- a. the company identification for each liquid organic material employed; and
  - b. documentation on whether or not each liquid organic material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling 12-month OC emission limitation of 10.5 tons per year.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report (PER) in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (3) The permittee shall identify if a "photochemically reactive material" (as defined in OAC rule 3745-21-01(C)(5)) was employed in the emissions unit in the annual PER.
- (4) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

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

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:

Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(3).
  - c. Emission Limitation:

The PE shall not exceed 0.5 pound of per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by using the PE factor of 0.5 pound of particulate emissions per hour (Air Pollution Engineering Manual, Second Edition, page 376).

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

d. Emission Limitation:

The OC emissions shall not exceed 35.0 pounds of per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by using the following equation:

$$[0.246* + (14/1,000,000)*] \times [X] = \text{lbs/hr of OC}$$

where:

X = maximum pounds of high OC compound.

If required, compliance with the hourly allowable OC emission limitation above shall be determined by using the test method(s) and procedures in Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Should the process and/or equation for allowable OC emissions change, the permittee shall reconfirm the OC emission factors and submit appropriate documentation to the Akron RAQMD.

\*The emission factors were developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

e. Emission Limitation:

The emissions of OC from this emissions unit shall not exceed 10.5 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(1) above and using the following equation:

$$[0.246*(X) + (14/1,000,000)*(Y)]/2000 = \text{tons of OC per year}$$

where:

X = total pounds of the high VOC compound per year; and

**Final Permit-to-Install and Operate**

Valley Rubber Mixing

**Permit Number:** P0106834

**Facility ID:** 1677011064

**Effective Date:** 10/6/2010

Y = total pounds of compound per year.

Should the process and/or equation for allowable OC emissions change, the permittee shall reconfirm the OC emission factors and submit appropriate documentation to the Akron RAQMD.

\*The emission factors were developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group - Group 1: P901, P902,**

EU ID	Operations, Property and/or Equipment Description
P901	60" two-roll mill - Mill A
P902	84 inch two roll mill B, fed by weigh stations (2)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. 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.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(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 are identified below. 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)	For emissions unit P901: The particulate emissions (PE) shall not exceed 0.569 pound per hour.  For emissions unit P902: The PE shall not exceed 1.0 pound per hour and 4.38 tons per year.  For emissions unit P901: The volatile organic compounds (VOC) emissions shall not exceed 2.8 pounds per hour.  For emissions unit P902: The VOC emissions shall not exceed 3.06 pounds per hour and 13.40 tons per year.
b.	OAC rule 3745-17-07(A)	Visible PE from the stacks serving the emissions units listed above shall not exceed 20 percent opacity as a six-minute average, except as provided by

**Final Permit-to-Install and Operate**

Valley Rubber Mixing

**Permit Number:** P0106834

**Facility ID:** 1677011064

**Effective Date:** 10/6/2010

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule.
c.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust from the emissions units listed above shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08	For emissions unit P901, the permittee shall employ equipment (e.g., hoods) to capture and vent PE to a cyclone and a fabric filter/baghouse.  For emissions unit P902, the permittee shall employ equipment (e.g., hoods) to capture and vent PE to a fabric filter/baghouse.
e.	OAC rule 3745-17-11	For emissions unit P901: The emission limitation required by this applicable rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  For emissions unit P902: The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-07(G)(2)	See c)(1) and b)(2)a. below.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)f., c)(1), d)(1), and e)(2).

c) Operational Restrictions

(1) The permittee shall not employ any photochemically reactive materials, 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 emissions units listed above:

- a. the company identification for each liquid organic material employed; and
  - b. documentation on whether or not each liquid organic material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- (2) The permittee shall perform daily checks, when either emissions unit listed above is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units listed above. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the emissions unit identification;
  - b. the location and color of the emissions;
  - c. whether the emissions are representative of normal operations;
  - d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - e. the total duration of any visible emissions incident; and
  - f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (e) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall identify the following information in the annual permit evaluation report (PER) in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
- a. all days during which any visible particulate emissions were observed from either stack serving the emissions units listed above;

- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units listed above; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (2) The permittee shall identify if a "photochemically reactive material" (as defined in OAC rule 3745-21-01(C)(5)) was employed in either emissions units list above in the annual PER.
- (3) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
- a. **Emission Limitation:**  
  
Visible PE from the stacks serving the emissions units listed above shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.  
  
Applicable Compliance Method:  
  
Compliance with the visible PE limitation shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).
  - b. **Emission Limitation:**  
  
Visible emissions of fugitive dust from the emissions units listed above shall not exceed twenty percent opacity as a three-minute average.  
  
Applicable Compliance Method:  
  
Compliance with the visible PE limitation shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(3).
  - c. **Emission Limitations:**  
  
For emissions unit P901: The PE shall not exceed 0.569 pound per hour.  
  
For emissions unit P902: The particulate emissions (PE) shall not exceed 1.0 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitations above shall be demonstrated by using the PE factor of 0.5 pound of particulate emissions per hour (Air Pollution Engineering Manual, Second Edition, page 376).

If required, compliance with the hourly allowable PE limitations above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

For emissions unit P902: The PE emissions shall not exceed 4.38 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the hourly allowable PE limitation by the maximum operating hours of 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

e. Emission Limitation:

For emissions unit P901: The VOC emissions shall not exceed 2.8 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by using the following equation:

$$[[0.014* + (14/1,000,000)*] \times [X] = \text{lbs/hr of VOC}$$

where:

X = maximum pounds of high VOC compound per hour.

If required, compliance with the hourly allowable VOC emission limitation above shall be determined by using the test method(s) and procedures in Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Should the process and/or equation for allowable VOC emissions change, the permittee shall reconfirm the VOC emission factors and submit appropriate documentation to the Akron RAQMD.

\*The emission factors were developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

f. Emission Limitation:

For emissions unit P902: The VOC emissions shall not exceed 3.06 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated using information provided by Valley Rubber Mixing, Inc. in their Permit to Install (PTI) application which was received on October 16, 2002. Based on mass balance studies performed by Valley Rubber Mixing, Inc., and their knowledge of the product, an average of 2.45 pounds per batch is emitted through the stack. The emission rate is calculated by multiplying that factor by the weight of the batch processed per hour.

If required, compliance with the hourly allowable VOC emission limitation above shall be determined by using the test method(s) and procedures in Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Should the process and/or equation for allowable VOC emissions change, the permittee shall reconfirm the VOC emission factors and submit appropriate documentation to the Akron RAQMD.

g. Emission Limitation:

For emissions unit P902: The VOC emissions shall not exceed 13.40 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable VOC limitation above shall be demonstrated by multiplying the hourly allowable VOC limitation by the maximum operating hours of 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g) Miscellaneous Requirements

(1) None.

**3. Emissions Unit Group - Group 2: P903, P905,**

EU ID	Operations, Property and/or Equipment Description
P903	84" two roll mill - Mill C
P905	Closed Chamber Banbury Mixer - Banbury F

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. 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.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(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 are identified below. 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)	For emissions unit P903: The particulate emissions (PE) shall not exceed 0.5 pound per hour.  For emissions unit P905: The PE shall not exceed 2.0 pounds per hour.  For emissions unit P903: The volatile organic compounds (VOC) emissions shall not exceed 1.0 pound per hour.  For emissions unit P905: The organic compounds (OC) emissions shall not exceed 1.0 pound per hour.
b.	OAC rule 3745-17-07(A)	Visible PE from the stacks serving the emissions units listed above shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust from the emissions units listed above shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08	For emissions units P903 and P905, the permittee shall employ equipment (e.g., hoods) to capture and vent PE to a fabric filter/baghouse.
e.	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-07(G)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)a. below.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)f.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when either emissions unit listed above is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units listed above. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the emissions unit identification;
- b. the location and color of the emissions;

- c. whether the emissions are representative of normal operations;
- d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- e. the total duration of any visible emissions incident; and
- f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (e) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall identify the following information in the annual permit evaluation report (PER) in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
  - a. all days during which any visible particulate emissions were observed from either stack serving the emissions units listed above;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units listed above; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (2) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

Visible PE from the stacks serving the emissions units listed above shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

b. Emission Limitation:

Visible emissions of fugitive dust from the emissions units listed above shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitations:

For emissions unit P903: The particulate emissions (PE) shall not exceed 0.5 pound per hour.

For emissions unit P905: The PE shall not exceed 2.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitations above shall be demonstrated by using the PE factor of 0.5 pound of particulate emissions per hour (Air Pollution Engineering Manual, Second Edition, page 376).

If required, compliance with the hourly allowable PE limitations above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

For emissions unit P903: The VOC emissions shall not exceed 1.0 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by using the following equation:

$$[(14/1,000,000)^*] \times [X] = \text{lbs/hr of VOC}$$

where:

X = maximum pounds of compound per hour.

If required, compliance with the hourly allowable VOC emission limitation above shall be determined by using the test method(s) and procedures in Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Should the process and/or equation for allowable VOC emissions change, the permittee shall reconfirm the VOC emission factors and submit appropriate documentation to the Akron RAQMD.

\*The emission factor was developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

e. Emission Limitation:

For emissions unit P905: The OC emissions shall not exceed 1.0 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by using the following equation

$$[(7.2/1,000,000)^*] \times (X) = \text{lbs/hr of OC}$$

If required, compliance with the hourly allowable OC emission limitation above shall be determined by using the test method(s) and procedures in Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Should the process and/or equation for allowable OC emissions change, the permittee shall reconfirm the OC emission factors and submit appropriate documentation to the Akron RAQMD.

\*The emission factor was developed using information provided by Valley Rubber Mixing, Inc. in a letter dated August 7, 1995.

g) Miscellaneous Requirements

(1) None.