Ohio Environmental Protection Agency

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

1/3/2011

Certified Mail

Facility ID: 0332010003
Permit Number: P0087035
County: Hancock

Jeremy Lamb
The Cooper Tire Company - Findlay
701 Lima Ave.
Findlay, OH 45840-0550

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 10/6/2010. 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 can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. 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
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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: Ohio EPA DAPC, Northwest District Office

Response to Comments

Response to comments for: Title V Permit

Facility ID:	0332010003
Facility Name:	The Cooper Tire Company - Findlay
Facility Description:	Tires and Inner Tubes
Facility Address:	701 Lima Ave. Findlay, OH 45840-0550 Hancock County
Permit #:	P0087035, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Courier on 10/09/2010. The comment period ended on 11/08/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
   a. Comment: **See company comments, as below**
   b. Response: **See agency responses, as below**

   Statement of Basis for Air Pollution Title V Permit Section
   COMPANY COMMENT 1:
   General Request: To complete this summary and help ensure compliance Cooper requests that for those emission units that have been identified as having reporting requirements, that a comment be inserted for that condition into the table similar to the comments of the other columns of the table. Such a comment could identify such information as if the reporting requirement pertains to a quarterly deviation, semi-annual emissions summary, etc.

   COMPANY COMMENT 2:
   Emission unit B005 PE Limitations: To be consistent with the other sources in the permit all columns associated with this source for PE should be identified as N as was done for B006. As was done for

emission source B006, the comments should then be modified to read “M, R, Rp, ET - None - ‘Static’ AP-42 emission factor calculation at maximum capacity determines compliance”.

COMPANY COMMENT 3:
Emission unit B005 S02 Limitations: To be consistent the “M” inserted into the Monitoring Requirements column should be changed to a "Y".

COMPANY COMMENT 4:
Emission unit B006 20% Opacity Limitations: Due to the restriction of the use of clean the!, monitoring of any non-clean fuel used, as well as the reporting/record keeping to support this, the columns identified as OR, M, R, and RP should be identified with a “Y”. This will be consistent with the identification of the same parameter on Emission Source B005.

COMPANY COMMENT 5:
Emission Units K002/K008 18 lbs VOC/hr Limitation: To clarify the condition, Cooper requests that the limitation be modified to identify that this limitation is for each emission source. Therefore this limitation would read ‘18.0 lbs VOC/hr each*'.

COMPANY COMMENT 6:
Emission units K002 0.535 ton VOC/month Limitations: In order to be consistent with this emission sources PTI as well as the emission limits identified in the Specific Conditions of this emission source (page 36 of the draft permit) this value should be in units of pounds VOC per month. Therefore please modify this condition to read 1070 lbs VOC /month.

COMPANY COMMENT 7:
Emission unit K008 lbs 35.2 lbs VOC/day; 6.42 ton VOC/yr Limitation: To be consistent with the similar condition for K002 and to reflect the material tracking, reporting, and record keeping requirements included in the permit, the columns associated with M, R, and RP should be identified with a “Y”.

AGENCY RESPONSE: (Comments 1 - 7)
While the agency has no disagreement with much of the observations in these company comments, note that the Statement of Basis is a one-time informational document that accompanies the Draft permit. As such, it is not typically amended.

B. Facility-Wide Terms and Conditions Section
COMPANY COMMENT 1:
Section B.3.b): Emission unit K004 is permanently shutdown and should be removed. Also, recently emission unit K005 has also been permanently shut down. Cooper will proceed to update its facility profile in Air Services and requests that this emission source be removed from this permit. This change will also affect the equipment listing found in condition B.18.a) requiring the removal of the reference to emission unit K005.

AGENCY RESPONSE:
The changes have been made as specified.

COMPANY COMMENT 2:
Section B.1): Please see the previous comment regarding the removal of K004 and K005 from the draft permit.

AGENCY RESPONSE:
The changes have been made as specified.

COMPANY COMMENT 3:
Section B.13.a): The reporting required by the referenced regulation, 40 CFR 60.546, applies to tread-cementing and green tire spray operations that utilize solvent-based materials. As written this condition references conditions B.10 and B.11. As specified in the PTI's associated with Cooper's green tire spray booths, and reflected in the fact the sources are considered Insignificant Sources in the remainder of the Title V permit, these sources utilize water-based materials. As such the semi-annual reporting required by the draft permit is not consistent with the reporting required in the NSPS for Tire Manufacturing. The reporting required in 40 CFR 60.546(1) which would require the reporting of monthly actual and average emission rates are required to those sources as applicable per the recordkeeping requirements found in 40 CFR 60.545. The record keeping conditions that would support the reporting required in the semi-annual report is only applicable to sources using solvent-based materials. As such this reporting requirement is applicable to Cooper's tread-cementing operations but not its green tire spray operations. Please modify this condition to be applicable only to condition B.10.b) or remove it from the permit as not being applicable to the emission sources located at Cooper.

AGENCY RESPONSE:
Note that the permit (and the regulation) uses the words "as applicable". The agency would agree with the company that, as long as the VOC content is less than one percent (as specified in the regulation), such reporting will not be necessary in the circumstances as discussed in the comment.

COMPANY COMMENT 4:
Section B.14.c)(3): The description of the determination of the total number of tires cemented or sprayed at the facility appears to only reflect the description for total tread end cementing /sidewall operations as described in 40 CFR 60.543(d)(i). However this condition appears to be intended only to discuss green tire spraying operations, therefore the description found in 40 CFR 60.453(d)(ii) would be more appropriate. Please revise this condition to match the language for green tire spraying operations as found below.

"For a green tire spraying operation that uses water-based inside green tire sprays, To equals the number of green tires that receive an application of water-based inside green tire spray for the month."

AGENCY RESPONSE:
The changes have been made as suggested.

COMPANY COMMENT 5:
To prevent confusion, and since tread cementing restrictions are not included in the conditions found in B.9 or B.10, it may be appropriate to remove the references to tires cemented in the remainder of Condition B.14.c) as it is not associated with the emission sources being discussed in this condition. This would also require the deletion of condition B.14.e).

AGENCY RESPONSE:
The changes have been made as suggested, except that B.14.e) is retained, but with "tread end cementing" replaced with "green tire spraying".

COMPANY COMMENT 6:
Section B.19: Cooper requests the removal of the information in parenthesis associated with items v-ee from the final permit as it is specific to Cooper and provides no additional information to the general public.

AGENCY RESPONSE:
The agency agrees with lack of relevance for the general public. However, experience has shown that internal company reference IDs such as those discussed here are often important for the company to later interface with the agency (for example, during a compliance inspection) and properly match permit requirements with the equipment /operations they apply to. The agency will retain these references in the Preliminary-proposed Title V permit (PPP), but would consider any further objection to this, during the company comment period for the PPP.

C. Emission Unit Terms and Conditions Section
COMPANY COMMENT 1:
Emissions Unit B006 d)(1) - (3) Monitoring and/or Recordkeeping: The conditions identified should be numbered 1-3 instead of 2-4 as found in the draft permit. Please revise the text accordingly.

AGENCY RESPONSE:
This seems to have been some inexplicable error that occurred in the final stages of administrative processing of this Draft permit. The agency will make an effort to ensure that this is not repeated for the PPP.

COMPANY COMMENT 2:
Emissions Unit B006 Section f)(1) - (2) Testing Requirements: The draft permit requires Cooper to perform stack testing of its primary boiler within three (3) months of the issuance of the revised Title V permit. As this boiler's primary fuel is natural gas, demonstrated by the fact that it has not utilized fuel oil other than for test firing in the last five years, the associated emissions from this source have been less than 15 tpy for NOx and less than 20 tpy for C02. These emissions are based upon the maximum operating rate of the boiler and the emission factors provided by EPA in AP-42. Furthermore a review of over a dozen Title V permits issued by OEPA within the last year has not yielded an example showing a similar sized boiler which utilizes natural gas and fuel oil having a condition requiring a stack test. Therefore Cooper believes that the costs of performing the emissions test to verify the AP-42 emission factor value is unnecessary and requests that the requirement be removed from the final permit. Consequently Cooper also requests that the "Y" inserted in the Emissions Testing columns found in the Statement of Basis: Emissions Unit Terms and Conditions summary table be changed to an "N".

AGENCY RESPONSE:
Our records do not show that this emissions unit has ever previously been required to peform an emissions test. Whereas actual emissions may vary from one year to the next, the permit limits are 61.8 tons NOx /year and 33.1 tons CO /year. The agency does not consider the testing requirement to be excessive.

COMPANY COMMENT 3:
Emissions Unit K002, Section c)(2): Cooper request that language be inserted to identify that the dry filtration system for the control of particulate emissions is to be used only when the automatic spraying functionality of this line is in use. Therefore this condition should instead read "The perniittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation...". Cooper also requests that a similar statement be inserted into any related conditions such as d)(9) and e)(3)e.

AGENCY RESPONSE:
The change has been made as suggested.

COMPANY COMMENT 4:
Emissions Unit K002, Section e)(3): Due to the low usage and relatively small allowable emission limit of the clean-up material, Cooper requests that the quarterly reporting required in this condition be modified to an annual reporting requirement to be consistent with Emission Source K008.

AGENCY RESPONSE:
Over a half ton of allowable clean-up material usage /emissions per month, while fairly moderate, is not negligibly small. The quarterly exceedance reporting in this instance is standard practice, as also reflected in the permit Standard Terms and Conditions, and will be retained. Regarding inconsistent reporting with emissions unit K008, note also that K008 has a different time period term of its emissions limit for clean-up material, i.e. daily. Incidentally, the clean-up record-keeping and reporting sections of K008 will be slightly modified, in the PPP.

COMPANY COMMENT 5:
Emissions Unit K008, Section c)(2): Cooper request that language be inserted to identify that the dry filtration system for the control of particulate emissions is to be used only when the automatic spraying functionality of this line is in use. Therefore this condition should instead read “The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation...”. Cooper also requests that a similar statement be inserted into any related conditions such as d)(9) and e)(3)d.

AGENCY RESPONSE:
The change has been made as suggested. See also comment 3 of this section.

COMPANY COMMENT 6:
Emission unit P135, Section b)(1): The limitation of 5.76 ton PE/year has been rounded up from 5.26 ton PE/yr in the current Title V permit. Also the limitation of 7.05 tons VOC/hr has been rounded up from 7.03 tons VOC/yr. Please verify the consistency of this rounding. Should changes be required, the corresponding values contained in other areas of the permit may also need to be updated, such as in the Statement of Basis section.

AGENCY RESPONSE:
The discrepancies have been corrected as specified in the comment.

COMPANY COMMENT 7:
Emission unit P135, Section d) and Emissions Unit Group A, Section d)(2): In the draft permit daily visible emission checks are required for the control devices associated with emission sources P135 and Group A (P136, P137, and P140). As the allowable particulate emissions from these sources are 1.2 lbs/hr and 0.15 lbs/hr respectively, performing daily inspections of the visible emissions appears to be excessive. Also, as previously related to OEPA, Cooper has installed a bag break detector in the discharge exhaust associated with P135 in order to evaluate its performance. Based upon the information gathered from this trial, Cooper currently plans on installing this equipment on the stacks associated with Group A. As these sensors will detect failure of the dust collectors as soon as the failure occurs, the inspection of the exhaust would appear to be redundant. However, Cooper would agree that observing the stack on the current weekly basis is appropriate for verification purposes.

AGENCY RESPONSE:
The agency agrees to change the monitoring to "weekly", to retain the frequency of the original Title V permit.

COMPANY COMMENT 8:
Emissions Unit Group A- Condition f)(1): Testing Requirements: The draft permit requires particulate emission (PE) testing of the mixing group to demonstrate compliance with the mass emission rate. As identified the permit condition the mass emission rate for each source is 0.15 lbs/hr and 0.66 tons/yr of PE. As these emission units are not CAM sources and have an allowable emissions rate of only 0.15 lbs/hr each, Cooper believes that performing these stack tests is excessive. Cooper has previously conducted stack tests on two sources of in this group, emission source P137 and P140, and the results were below the 0.15 lbs/hr limit. Since this time no modifications have been made to the equipment other than the use of a smaller micron filters being used that should further reduce the particulate emissions from the dust collectors. Therefore Cooper believes that the costs of performing the emissions test to verify the minimal emissions that are being considered, especially when considering the installation of the bag break sensors discussed above, is unnecessary and requests that the requirement be removed from the final permit.

AGENCY RESPONSE:
Our records show the emissions testing as mentioned in the comment. Our records do not show this testing, performed in 1998, as an approved compliance test. The agency does not consider the testing requirement, within the term of this Title V renewal permit, to be excessive.

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
The Cooper Tire Company - Findlay

Facility ID:	0332010003
Permit Number:	P0087035
Permit Type:	Renewal
Issued:	1/3/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
The Cooper Tire Company - Findlay

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Authorization

Facility ID: 0332010003
Facility Description: Tires and Inner Tubes
Application Number(s): A0017936, A0017937, A0017938, A0037270, A0039022
Permit Number: P0087035
Permit Description: Title V permit renewal
Permit Type: Renewal
Issue Date: 1/3/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087034

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

The Cooper Tire Company - Findlay
701 Lima Ave.
Findlay, OH 45840-0550

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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 Ohio EPA DAPC, Northwest District Office. 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) 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 Ohio EPA DAPC, Northwest District Office.

(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) B.19.

2. The following rule is applicable to this facility: 40 CFR 63.5980 et seq. (Subpart XXXX)

   The permittee shall comply with the applicable emission limitation of 40 CFR 63 Table 1 to Subpart XXXX, for tire production affected sources:

   a) Option 1 - HAP constituent option:

      (1) Emissions of each HAP (Hazardous Air Pollutant) in Table 16 to Subpart XXXX must not exceed 1,000 grams HAP per megagram (2 pounds per ton) of total cements and solvents used at the tire production affected source, and

      (2) Emissions of each HAP not in Table 16 to Subpart XXXX must not exceed 10,000 grams HAP per megagram (20 pounds per ton) of total cements and solvents used at the tire production affected source.

   b) Option 2 - production-based option: Emissions of HAP must not exceed 0.024 grams per megagram (0.00005 pounds per ton) of rubber used at the tire production affected source.

3. The following is the list of the emissions units at this facility that are 'tire production affected sources' subject to 40 CFR 63.5980 et seq. (Subpart XXXX):

   a) significant emissions units K002, K008, P216, P217, and R012

   b) insignificant emissions units K003, K006, K007, K010, K011, and K012

   c) all other processes that use or process cements and solvents as defined in 40 CFR 63.6015, including, but not limited to: storage and mixing vessels and the transfer equipment containing cements and/or solvents; wastewater handling and treatment operations; tread end cement operations; tire painting operations; ink and finish operations; undertread cement operations; process equipment cleaning materials; bead cementing operations; tire building operations; green tire spray operations; extruding, to the extent cements and solvents are used; cement house operations; marking operations; calendar operations, to the extent solvents are used; tire striping operations; tire repair operations; slab dip operations; other tire building operations, to the extent that cements and solvents are used; and balance pad operations.

4. The permittee shall use one of the 'alternatives' below, for any given compliance period:

   a) Purchase alternative. Use only cements and solvents that, as purchased, contain no more HAP than allowed by the emission limits in B.2.a (i.e. option 1 - HAP constituent option).

   b) Monthly average alternative, without using an add-on control device. Use cements and solvents in such a way that the monthly average HAP emissions do not exceed the emission limits in B.2.a or B.2.b (i.e. option 1 or option 2).

   [40 CFR 63.5985(a), (b)]

5. The permittee must be in compliance with the applicable emission limitations specified in B.2 at all times.

[40 CFR 63.5990(a)]

6. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart XXXX, including the following sections:

   63.6003(a) - monitor and collect data as specified in Table 9 to Subpart XXXX

   63.6004(c)(2) - update the list of all the cements and solvents used

   63.6011(a) - retention of copies of reports / notifications

   63.6011(b) - tire production affected source records specified in Table 9 of Subpart XXXX

   63.6012 - records retention (general)
   [OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart XXXX]

7. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart XXXX, including the following sections:

   63.6004(b) - deviation reporting requirements

   63.6004(c)(3) - updated list inclusion in compliance report

   63.6009(a) - notifications - MACT General Provisions

   63.6010(a) - submit each applicable report in table 15 to this subpart

   63.6010(b) - requirements for semi-annual reports

   63.6010(c) - reporting requirements (general)

   63.6010(d) - compliance report - deviations and corrective action (if applicable)

   63.6010(e) - reporting in accordance with Title V operating permit

   63.6010(f), (g) - provision for reduced reporting, electronic reporting
   [OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart XXXX]

8. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart XXXX, including the following sections:

   63.5994(a) - Methods to determine the mass percent of HAP in cements and solvents

   63.5994(b)(1), (3), and (4) - Methods to demonstrate compliance with the HAP constituent emission limits in Table 1 to this subpart (option 1)

   63.5994(c)(1), (2), (3), and (5) - Methods to demonstrate compliance with the production-based emission limits in Table 1 to this subpart, option 2.

   63.5994(f) - How to take credit for HAP emissions reductions when streams are combined (if applicable)

63.6004(a) - demonstrate continuous compliance with each applicable limit in Table 1 to this subpart using the methods specified in Table 10 to Subpart XXXX

63.6004(c)(1) - cement / solvent HAP verification
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart XXXX]

9. In conjunction with B.2, B.3, and B.4, the permittee shall comply with the following miscellaneous requirements: Table 17 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

10. The following rule is applicable to this facility: 40 CFR 60.540 et seq. (Subpart BBB)

    The permittee shall comply with the applicable emission limitation of 40 CFR 60.542(a)(5), (6), and (7):

    a) For each green tire spraying operation where only water-based sprays are used:

        (1) 1.2 grams (0.0026 lb) of VOC (volatile organic compound) per tire sprayed with an inside green tire spray for each month; and

        (2) 9.3 grams (0.021 lb) of VOC per tire sprayed with an outside green tire spray for each month.

    b) For each green tire spraying operation where only organic solvent-based sprays are used: Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon the duration of the compliance period:

        (1) 3,220 kg (7,099 lb) of VOC per 28 days,

        (2) 3,340 kg (7,363 lb) of VOC per 29 days,

        (3) 3,450 kg (7,606 lb) of VOC per 30 days,

        (4) 3,570 kg (7,870 lb) of VOC per 31 days, or

        (5) 4,030 kg (8,885 lb) of VOC per 35 days.

    c) Each green tire spraying operation where both water-based and organic solvent-based sprays are used shall comply with the provisions of both 10.a (water-based) and 10.b (solvent-based), as applicable.

11. The following is the list of the insignificant emissions units at this facility that are 'affected facilities' subject to 40 CFR 60.540 et seq. (Subpart BBB): emissions units K003, K006, K007, K010, K011, and K012. [See also B.15.]

12. In conjunction with B.10 and B.11, the permittee shall comply with the following monitoring and/or record keeping requirements:

    a) Each owner or operator that is required to conduct monthly performance tests, as specified in B.14.a), shall maintain records of the results of all monthly tests.
    [40 CFR 60.545(e)]

b) If the permittee verifies formulation data under the provisions of B.14.d), the permittee shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the material.
[40 CFR 60.545(f)]

13. In conjunction with B.10 and B.11, the permittee shall comply with the following reporting requirements:

a) Once every 6 months, the permittee shall report, as applicable, each monthly average VOC emission rate per tire, and each VOC monthly emissions rate, that exceeds the applicable VOC emission limit specified in 10.a).

In accordance with 40 CFR 60.546(g), the semi-annual reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. The reports shall be submitted electronically through Ohio EPA Air Services.
[40 CFR 60.546(f)]

b) Under the provisions of 14.d), if applicable, the permittee shall report annually the formulation data or Method 24 results to verify the VOC content of the water-based materials in use. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

If the material formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the material shall be reported within 30 days of the change. The reports shall be submitted electronically through Ohio EPA Air Services.
[40 CFR 60.546(j)]

14. In conjunction with B.10 and B.11, the permittee shall comply with the following testing/ compliance demonstration requirements:

a) The permittee shall conduct the performance test in B.14.b) or B.14.c), as applicable, each month, except as provided in 14.d).

40 CFR 60.8(d) does not apply to the monthly performance test procedures required by Subpart BBB. 40 CFR 60.8(f) does not apply when Method 24 is used.
[40 CFR 60.543(b)(1) and (a)]

b) For each green tire spraying operation (uncontrolled) where organic solvent-based sprays are used, the permittee shall use the following procedure to determine compliance with the applicable (depending upon duration of compliance period) uncontrolled monthly VOC use limit specified under B.10.b:

(1) Determine the density and weight fraction VOC (including dilution VOC) of each green tire spray from its formulation or by analysis of the spray using 40 CFR 60, Appendix A, Method 24. If a dispute arises where formulation data is used, the Ohio EPA may require the permittee to analyze the spray using Method 24.

(2) Calculate the total mass of VOC used at the affected facility for the month (M_O) by the following procedure:

(a) For systems where green tire spray is delivered in batch or via a distribution system that serves only this emissions unit:

$$M_O = \sum_{i=1}^{a} LC_i \; DC_i \; WO_i$$

Where:

LC = volume of spray material used for a month (liters (gallons))

DC = density of spray material (grams per liter (lb per gallon))

WO = weight fraction of VOC in a spray material

"a" equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

(b) For systems where green tire spray is delivered via a common distribution system that also serves other affected facilities:

(i) Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^{b} LC_i \; DC_i \; WO_i$$

Where:

LC_i DC_i WO_i as in B.14.b)(2)(b) above.

"b" equals the number of different sprays used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

(ii) Determine the fraction (F_O) of M used at the affected facility by comparing the production records and process specifications for the material cemented at the affected facility for the month to the production records and process specifications for the material cemented at all other facilities served by the common distribution system for the month or by another procedure acceptable to the US EPA Administrator.

(iii) Calculate the total monthly mass of VOC used at the affected facility for the month (M_O): $M_O = MF_O$

(3) Determine the time duration of the monthly compliance period (T_d).
[40 CFR 60.543(c)]

c) For each green tire spraying operation where water-based cements or sprays containing 1.0 percent, by weight, of VOC or more are used (inside and/or outside), the permittee shall use the following procedure to determine compliance with the VOC emission per tire limit specified under B.10.a:

(1) Determine the density and weight fraction VOC as determined in B.14.b)(1).

(2) Calculate the total mass of VOC used at the affected facility for the month (M_O) as determined in B.14.b)(2).

(3) Determine the total number of tires cemented or sprayed at the affected facility for the month (T_O) by the following procedure: For a green tire spraying operation that uses water-based inside green tire sprays, To equals the number of green tires that receive an application of water-based inside green tire spray for the month.

(4) Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month (G):

$G = M_O / T_O$

(5) Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month (N): N = G
[40 CFR 60.543(d)]

d) If the permittee uses only water-based materials (inside and/or outside) containing less than 1.0 percent, by weight, of VOC, the permittee is not required to conduct the monthly performance test in B.14.b) and B.14.c). In lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement, provided the formulation has not changed during the previous 12 months. If the material formulation changes, formulation data or Method 24 analysis of the new material shall be conducted to determine the VOC content of the material and reported to Ohio EPA within 30 days as required under B.13.b) of this permit and 40 CFR 60.546(j).
[40 CFR 60.543(b)(4)]

e) In determining compliance for each green tire spraying operation, the permittee shall include only those tires defined under 40 CFR 60.541(a) when determining T_O.
[40 CFR 60.543(m)]

f) Method 24 or formulation data shall be used for the determination of the VOC content of green tire sprays. In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.
[40 CFR 60.547(a)(1)]

15. In addition to the insignificant emissions units in B.11, the following significant emissions unit(s) contained in this permit are subject to 40 CFR, Part 60, Subpart BBB: K002 and K008. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency. See also Section C. - Emissions Unit Terms and Conditions, for K002 and K008.

16. Miscellaneous requirements: The emissions units of B.11 and B.15 are subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

17. The emissions unit(s) contained in B.3 are subject to 40 CFR, Part 63, Subpart XXXX. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from

the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

18. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, 40 CFR Part 60, Subpart BBB, and/or 40 CFR Part 63, Subpart XXXX.

a) K003 and K006 - Green Tire Painters 10 and 12
b) K007 - Green Tire Spray Booth -Adv Mfg (PTI 03-13999 issued 18 Nov 2003)
c) K010 through K012 - Green Tire Spray Booths (PTI P0104902 issued 17 Jun 2009)
d) L001 through L015 - Cold Cleaner Degreaser 1 through 15
e) P154 through P156 - Tire Curing Presses (PTI 03-16336 issued 24 Mar 2005)
f) P157 through P166 - Tire Curing Presses (PTI 03-16354 issued 21 Jul 2005)
g) P167 and P168 - Tire Curing Presses (PTI 03-17152 issued 30 May 2006)
h) P169 through P178 - Tire Curing Presses (PTI 03-17190 issued 8 Aug 2006)
i) P179 through P189 - Tire Curing Presses (PTI 03-17293 issued 13 Mar 2007)
j) P190 through P199 - Tire Curing Presses (PTI P0106765 issued 15 Sep 2010)
k) P201 through P215 - Tire Curing Presses (PTI P0106766 issued 15 Sep 2010)
l) P221 through P296 - Tire Building Machines
m) P801 through P810 - Tire Curing Presses (PTI registration: 03-13333 issued 15 Dec 1999)
n) P811, P815, and P819 through P839 -Tire Curing Presses (PTI P0106763 issued 15 Sep 2010)
o) P840 - Tire Curing Press (PTI P0106767 issued 15 Sep 2010)
p) P841 through P846 - Tire Curing Presses (PTI 03-13360 issued 21 Nov 2000)
q) P847 through P867 - Tire Curing Presses (PTI 03-13536 issued 16 Nov 2000)
r) P871 and P872 - Tire Curing Presses (PTI P0106772 issued 15 Sep 2010)
s) P876 through P891 - Tire Curing Presses (PTI P01016758 issued 15 Sep 2010)
t) P892 - Tire Curing Presses (PTI 03-16241 issued 28 Sep 2004)
u) P893 through P899 - Tire Curing Presses (PTI 03-16336 issued 24 Mar 2005)
v) R009 - R & D Spraybooth

19. 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:

a) P018 - Tire Curing Presses (E01-E15)
b) P019 - Tire Curing Presses (F01-F15)
c) P024 - Tire Building Stations
d) P026 through P028 - White Sidewall Buffers: Unibuffer #5; moved to Unibuffers #10, #1
e) P118 through P121 - Tire Uniformity Optimizer #1 through #4
f) P122 - White Sidewall Buffer #5 - Moved to Unibuffer #4
g) P123 - Manual White Sidewall Buffer #6 - Unibuffer #6
h) P124 - Tire Uniformity Optimizer #5
i) P125 - Tire Test Stand with Ozone Generator
j) P126 - Tire Uniformity Optimizer #6
k) P127 - Pellet Cooler or Rotary Cooler
l) P128 - Tire Uniformity Optimizer #8
m) P129 - Tire Test Stand with Ozone Generator

n) P130 through P133 - Tire Uniformity Optimizer #7, #9, #10, #11
o) P138 - Mold Cleaner #2
p) P143 and P145 - Tire Uniformity Optimizers #12 and #13
q) P146 - Mold Cleaner
r) P148 - Black Sidewall Component Line #9
s) P149 - WSW Component Line #10
t) P218 through P220 - #6 Mill, #7 Mill, Refiner Mill
u) R015 - Bead ID Paint Operations
v) T005 - Tank #2 - Tank Farm (2224)
w) T006 - Tank #1 - Tank Farm (2224)
x) T007 - Process Oil Storage Tank #6 - In Basement (2605)
y) T008 - Tank #6 - Tank Farm (16003)
z) T009 - Process Oil Storage Tank #7 - In Basement (2224)
aa) T010 - Process Oil Storage Tank #5 - In Basement (2223)
bb) T011 - Process Oil Storage Tank #8 - In Basement (13058)
cc) T012 - Tank #5 - Tank Farm (16003)
dd) T015 - Tank #4 - Tank Farm (2223)
ee) T016 - Tank #3 - Tank Farm (2223)
ff) T017 - Above Ground Hydraulic Oil Storage Tank

C. Emissions Unit Terms and Conditions

1. B005

Operations, Property and/or Equipment Description:

boiler - 118 mmBtu /hour - natural gas and No. 2 fuel oil (stand-by boiler)

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 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) /mmBtu of actual heat input
b.	OAC rule 3745-18-06(D)	1.6 lb sulfur dioxide (SO_2) /mmBtu of actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-31-05 (PTI 03-927 issued April 1, 1980)	See b)(2)a.
e.	OAC rule 3745-21-08(B)	See b)(2)b.
f.	40 CFR 63.52(a)(2)	See b)(2)c.

(2) Additional Terms and Conditions

a. The requirements established under this Permit To Install (PTI) pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-10(B), 3745-18-06(D), 3745-17-07(A), and 3745-21-08(B).

b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the

requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

(1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.
[OAC 3745-18-06(D) and OAC 3745-77-07(A)(1)]

(2) The permittee shall burn only natural gas, and/or fuel oil No. 1/ No. 2 [as specified in c)(1)], in this emissions unit.
[OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745 18 04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.
[OAC rules 3745-18-04(E)(3) and 3745-18-04(I), and OAC 3745-77-07(C)(1)]

(2) For each day during which the permittee burns a fuel other than natural gas, or fuel oil No. 1 or No. 2, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the any exceedance of the allowable sulfur dioxide emission limitation, pounds sulfur dioxide/MMBtu actual heat input.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations 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).
[OAC 3745-15-03(B)(1)(a), OAC 3745-15-03(C), OAC 3745-77-07(A)(3)(c), and OAC 3745-77-07(C)(1)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, or diesel fuel as specified in c)(2), was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:
0.020 pound PE per mmBtu actual heat input

Applicable Compliance Method:
When firing natural gas, compliance may be determined by multiplying the maximum gas burning capacity of the emissions unit (0.118 mm cu. ft. /hour) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-2 (revised 7/98)] of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (118 mmBtu/hour).

When firing No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (843 gallons/hour) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (118 mmBtu/hour).

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).
[OAC 3745-77-07(C)(1)]

b. Emission Limitation:
1.6 pounds SO_2 /mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated in accordance with the recordkeeping specified in d)(1).

If required, the permittee shall demonstrate compliance with the SO_2 emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.
[OAC 3745-77-07(C)(1)]

c. Emission Limitation:
Visible PE shall not exceed 20% 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 methods specified in OAC rule 3745-17-03(B)(1).
[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. B006

Operations, Property and/or Equipment Description:

boiler - 89.9 mmBtu /hour - natural gas and No. 2 fuel oil (de-rated from 168.1 mmBtu /hour)

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 03-7462 as modified September 9, 2003)	45.6 lbs sulfur dioxide (SO_2) /hour; 200 tons SO_2 /year 14.1 lbs nitrogen oxide (NO_X) /hour; 61.8 tons NO_X /year 7.55 lbs carbon monoxide (CO) /hour; 33.1 tons CO /year 1.28 lbs particulate emissions (PE) /hour; 5.61 tons PE /year 0.98 lb organic compound (OC) /hour; 4.30 tons OC /year See b)(2)a and b)(2)b.
b.	40 CFR 60.40c et seq. (NSPS Subpart Dc)	See b)(2)c and c)(1).
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-10 (B)(1)	See b)(2)d.
e.	OAC rule 3745-18-06(D)	See b)(2)d.
f.	OAC rule 3745-21-08(B)	See b)(2)e.
g.	40 CFR 63.52(a)(2)	See b)(2)f.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of 'low NO_X burners'.

b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A) and 40 CFR 60.40c et seq. (NSPS Subpart Dc).

c. The applicability of OAC rule 3745-17-07(A) and 40 CFR 60.43c (c) for this emissions unit overlap, and result in opacity restrictions as follows:

i. when firing natural gas: visible emissions not more than 20 percent opacity (6-minute average), except for one 6-minute period in any sixty minutes of not more than 60 percent opacity.

ii. when firing No. 2 fuel oil': visible emissions not more than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. This requirement shall apply at all times, including periods of startup or shutdown lasting no longer than three hours, and malfunction periods which conform with OAC 3745-17-07(A)(3)(c).

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

e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.
[40 CFR 63.52(a)(2)]

g. The hourly SO_2, NO_X, CO, and OC emission limitation(s) represent the potential(s) to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The permittee shall combust oil in the affected facility that contains not greater than 0.5 weight percent sulfur.
[OAC 3745-77-07(A)(1), PTI 03-7462, and 40 CFR 60.42c (d)]

(2) The permittee shall burn only natural gas, and/or fuel oil No. 1/ No. 2 in this emissions unit.
[OAC 3745-77-07(A)(1) and PTI 03-7462]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall keep records of fuel oil supplier certification, which shall include the following information:

a. The name of the oil supplier.

b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.

c. The sulfur content of the oil.
[OAC 3745-77-07(C)(1), PTI 03-7462, and 40 CFR 60.48c (e)(11), and (f)]

(2) The permittee shall record and maintain records of the amounts of each fuel combusted during each month.
[OAC 3745-77-07(C)(1), PTI 03-7462, and 40 CFR 60.48c (g)(2)]

(3) For each day during which the permittee burns a fuel other than natural gas, or fuel oil No. 1 or No. 2, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
[OAC 3745-77-07(C)(1) and PTI 03-7462]

e) Reporting Requirements

(1) The permittee shall submit reports of the records of fuel oil supplier certifications from d)(1). The report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-7462, and 40 CFR 60.48c (d), (e)(11), and (j)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, or diesel fuel as specified in c)(2), was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-7462]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after the effective date of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO_X and CO.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

NO_X: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A
CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A

d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

[OAC 3745-77-07(C)(1)]

(2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where

warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).
[OAC 3745-77-07(C)(1)]

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

a. Emission Limitation:
45.6 lbs SO_2 /hour

Applicable Compliance Method:
The hourly emission limitation is based on the combustion of No. 2 fuel oil which represents a "worst case scenario" for SO_2 emissions. The hourly emission limitation was established by multiplying the maximum capacity of the boiler (89.9 mmBtu/hour), the heat content of No. 2 fuel oil (1 gallon /140,000 Btu), a maximum sulfur content of 0.5% wt, and an emission factor of (142 lbs SO2 x wt% sulfur /1000 gallons of fuel oil) from AP-42 Section 1.3, Fuel Oil Combustion [9/98]. Therefore provided compliance is shown with the maximum sulfur content of 0.5% wt, compliance with the hourly limitation will be assumed.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Methods 1- 4, and 6.
[OAC 3745-77-07(C)(1) and PTI 03-7462]

b. Emission Limitation:
14.1 lbs NO_X /hour

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum capacity of the boiler (89.9 mmBtu/hour), and an emission factor of 0.1570 lb of NO_X /mmBtu * (based on RATA emissions testing, April 2001).

* worst-case fuel- oil firing

The permittee shall demonstrate compliance with the emissions limitation based on the results of stack testing in accordance with the requirements specified in f)(1).
[OAC 3745-77-07(C)(1) and PTI 03-7462]

c. Emission Limitation:
7.55 lbs carbon monoxide (CO) /hour

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum gas burning capacity of the emissions unit (89,900 cu. ft. /hour), and an emission factor of 84 lbs of CO /mm cu ft of natural gas (AP-42 Section 1.4, Natural Gas Combustion [7/98]).

* worst-case fuel- gas firing

The permittee shall demonstrate compliance with the emissions limitation based on the results of stack testing in accordance with the requirements specified in f)(1).
[OAC 3745-77-07(C)(1) and PTI 03-7462]

d. Emission Limitation:
1.28 lbs PE /hour

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum capacity of the boiler (89.9 mmBtu/hour), the heat content of No. 2 fuel oil (1 gallon /140,000 Btu), and an emission factor of 2 lb PE /1000 gallons of fuel oil from AP-42 Section 1.3, Fuel Oil Combustion [9/98].

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Methods 1- 5.

* worst-case fuel- oil firing
[OAC 3745-77-07(C)(1) and PTI 03-7462]

e. Emission Limitation:
0.98 lb organic compound (OC) /hour

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum gas burning capacity of the emissions unit (89,900 cu. ft. /hour), and an emission factor of 11 lbs of TOC /mm cu ft of natural gas (AP-42 Section 1.4, Natural Gas Combustion [7/98]).

* worst-case fuel- gas firing

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
[OAC 3745-77-07(C)(1) and PTI 03-7462]

f. Emission Limitation:
200 tons SO_2 /year
61.8 tons NO_X /year
33.1 tons CO /year
5.61 tons PE /year
4.30 tons OC /year

Applicable Compliance Method:
The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.
[OAC 3745-77-07(C)(1) and PTI 03-7462]

g. Visible Emission Limitation(s):
20% opacity, as a six-minute average [See b)(2)c.]

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
[OAC 3745-77-07(C)(1) and PTI 03-7462]

g) Miscellaneous Requirements

(1) This emissions unit is subject to Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

3. K002

Operations, Property and/or Equipment Description:

Manual /Automatic Tread End Cement Station (spray and brush application)

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.	40 CFR 60.540 et seq. (NSPS Subpart BBB)	For tread end cementing operation: 10 grams (0.022 lb) of volatile organic compounds (VOC) per tire cemented (monthly average) [40 CFR 60.542(a)(3)]
b.	OAC rule 3745-31-05(D) (PTI 03-17298 issued August 28, 2008)	30.0 tons of VOC per rolling 12-month period, for tread end cement usage [See b)(2)a.]
c.	OAC rule 3745-31-05(A)(3)	(for tread end cement usage) 18.0 lbs of VOC /hour (for clean-up material usage) 1070 lbs VOC /month; 6.42 tons VOC /year
d.	OAC rule 3745-21-09(X)(1)	None [See b)(2)b).]
e.	OAC rule 3745-17-11(B)(2)	None [See b)(2)c and b)(2)f.]
f.	OAC rule 3745-17-07 (A)	None [See b)(2)d and b)(2)f.]
g.	OAC rule 3745-17-11(C)	See b)(2)e, c)(2), and c)(3).
h.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014) [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - tread end cement operation' subject to the emission limitations /control requirements specified in this section.]	Table 1 to Subpart XXXX: Option 1 - HAP constituent option; or Option 2 - production-based option See b)(2)h.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Annual emissions shall not exceed 30.0 tons of VOC, based upon a rolling, 12-month summation of the monthly emissions, for tread end cement usage. The emission limitation is based on input restrictions [see c)(1)] for the purpose of establishing federally enforceable limitations below 'significant increase' threshold for "Prevention of Significant Deterioration" (PSD) applicability.

b. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X)(1) pursuant to OAC rule 3745-21-09(X)(2)(d).

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(2) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

f. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

g. The hourly VOC emission limitation for cement represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

h. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for this emissions unit (see Sections B.2 through B.9).

c) Operational Restrictions

(1) The maximum annual tread end cement usage for this emissions unit shall not exceed 10,000 gallons per year, based upon a rolling 12-month summation of the gallon usage. The VOC content of the tread end cement shall not exceed 6.00 pounds per gallon, as applied.
[OAC 3745-77-07(A)(1) and PTI 03-17298]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
[OAC rule 3745-17-11(C)(1) and (2)(b), and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
[OAC rule 3745-17-11(C)(2)(e), and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) Each owner or operator that is required to conduct monthly performance tests, as specified in f)(1), shall maintain records of the results of all monthly tests.
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.545(e)]

(2) If the permittee verifies formulation data under the provisions of f)(4), the permittee shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the material.
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.545(f)]

(3) The permittee shall collect and record the following information each month for all coating (cement) materials for this emissions unit:

a. the company name or identification for each coating material employed;

b. the volume, in gallons, of each coating material employed;

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

d. the VOC emission rate, in pounds, for each coating material employed [d)(3)b times d)(3)c];

e. the total VOC emission rate from all coating materials employed [summation of d)(3)d], in pounds or tons; and

f. the rolling, 12-month VOC emission rates, i.e. rolling 12-month total of d)(3)e, in tons.

[OAC 3745-77-07(C)(1) and PTI 03-17298]

(4) The permittee shall collect and record the following information each month for all clean-up materials used in this emissions unit:

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

b. the volume, in gallons, of each cleanup material employed;

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

d. the total VOC emission rate, in pounds, for each cleanup material employed [d)(4)b times d)(4)c]; and

e. the total VOC emission rate from all cleanup materials employed [summation of d)(4)d], in pounds or tons; and

f. the annual, year-to-date, VOC emissions, in tons, from all cleanup materials employed [summation of d)(4)e] for each calendar month to date from January to December.

[OAC 3745-77-07(C)(1) and PTI 03-17298]

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
[OAC 3745-17-11(C)(2)(a), and OAC 3745-77-07(C)(1)]

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
[OAC rule 3745-17-11(C)(2)(d) and (f), and OAC 3745-77-07(C)(1)]

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
[OAC rule 3745-17-11(C)(2)(f) and (g), and OAC 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Once every 6 months, the permittee shall report, as applicable, each monthly average VOC emission rate that exceeds the VOC emission limit per tire specified in b)(1)a. [At the time of permit processing, the permittee is complying under the averaging period of 'calendar month', under 40 CFR 60.546(b).]

In accordance with 40 CFR 60.546(g), the semi-annual reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.546(f)]

(2) Under the provisions of f)(4), if applicable, the permittee shall report annually the formulation data or Method 24 results to verify the VOC content of the water-based materials in use. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

If the material formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the material shall be reported within 30 days of the change. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.546(j)]

(3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the VOC content restriction of c)(1);

b. any exceedances of the cement usage restriction of c)(1);

c. any exceedances of the rolling, 12-month VOC limitation specified in b)(1)b;

d. any exceedances of the monthly VOC limitation for clean-up specified in b)(1)c; and

e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
[OAC 3745-15-03(B)(1)(a) and OAC 3745-15-03(C); and OAC 3745-77-07(C)(1)]

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations 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).
[OAC 3745-77-07(C)(1) and PTI 03-17298]

f) Testing Requirements

(1) The permittee shall conduct the performance test in f)(2) and f)(3) each month, except as provided in f)(4).

40 CFR 60.8(d) does not apply to the monthly performance test procedures required by Subpart BBB. 40 CFR 60.8(f) does not apply when Method 24 is used.
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(b)(1) and (a)]

(2) The permittee shall use the following procedure to calculate the total mass of VOC used at the affected facility for the month (M_O) by the following procedure:

a. For systems where cement is delivered in batch or via a distribution system that serves only this emissions unit:

$$M_O = \sum_{i=1}^{a} LC_i \; DC_i \; WO_i$$

Where:

LC = volume of cement material used for a month (liters (gallons))

DC = density of cement material (grams per liter (lb per gallon))

WO = weight fraction of VOC in a cement material

"a" equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

b. For systems where cement is delivered via a common distribution system that also serves other affected facilities:

i. Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^{b} LC_i \; DC_i \; WO_i$$

Where:

LC_i DC_i WO_i as in f)(3)a above.

"b" equals the number of different cements used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

ii. Determine the fraction (F_O) of M used at the affected facility by comparing the production records and process specifications for the material cemented at the affected facility for the month to the production records and process specifications for the material cemented at all other facilities served by the common distribution system for the month or by another procedure acceptable to the US EPA Administrator.

iii. Calculate the total monthly mass of VOC used at the affected facility for the month (M_O): $M_O = MF_O$

[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(c)(2)]

(3) The permittee shall use the following procedure to determine compliance with the VOC emission per tire limit specified in b)(1)a:

a. Determine the density and weight fraction VOC (including dilution VOC) of each cement from its formulation or by analysis of the cement using 40 CFR 60, Appendix A, Method 24. If a dispute arises where formulation data is used, the Ohio EPA may require the permittee to analyze the cement using Method 24.

b. Calculate the total mass of VOC used at the affected facility for the month (M_O) as specified under f)(2).

c. Determine the total number of tires cemented or sprayed at the affected facility for the month (T_O) by the following procedure: For a tread end cementing operation, T_O equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.

d. Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month (G):

$G = M_O / T_O$

e. Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month (N): $N = G$

[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(d), and (c)(1)]

(4) If the permittee uses only water-based materials (inside and/or outside) containing less than 1.0 percent, by weight, of VOC, the permittee is not required to conduct the monthly performance test in f)(2) and f)(3). In lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to

verify the VOC content of each tread end cement, provided the formulation has not changed during the previous 12 months. If the material formulation changes, formulation data or Method 24 analysis of the new material shall be conducted to determine the VOC content of the material and reported to Ohio EPA within 30 days as required under e)(2) of this permit for this emissions unit, and 40 CFR 60.546(j).
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(b)(4)]

(5) In determining compliance for each tread end cementing operation, the permittee shall include only those tires defined under 40 CFR 60.541(a) when determining T_O.
[OAC 3745-77-07(C)(1), PTI 03-17298, and 40 CFR 60.543(m)]

(6) Method 24 or formulation data shall be used for the determination of the VOC content of cements (or clean-up materials). In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.
[OAC 3745-77-07(C)(1) and PTI 03-17298, and 40 CFR 60.547(a)(1)]

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

a. Emission Limitation:
18.0 lbs of VOC /hour (for cements)

Applicable Compliance Method:
The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum allowable VOC content of the coating (6.00 pounds per gallon).
[OAC 3745-77-07(C)(1) and PTI 03-17298]

b. Emission Limitation:
1070 lbs VOC /month; 6.42 tons VOC /year (for clean-up solvents)

Applicable Compliance Method:
Compliance with the monthly limitation shall be based on the record keeping requirements as specified in d)(4)d.

The annual allowable limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is shown, compliance with the annual limitation shall be assumed.
[OAC 3745-77-07(C)(1) and PTI 03-17298]

c. Emission Limitation:
30.0 tons VOC per rolling, 12-month period, for tread end cement usage

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(3).
[OAC 3745-77-07(C)(1) and PTI 03-17298]

g) Miscellaneous Requirements

(1) This emissions unit is subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

4. K008

Operations, Property and/or Equipment Description:

Automatic/Manual Tread End Cementer (spray and brush application)

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.	40 CFR 60.540 et seq. (NSPS Subpart BBB)	For tread end cementing operation: 10 grams (0.022 lb) of volatile organic compounds (VOC) per tire cemented (monthly average) [40 CFR 60.542(a)(3)]
b.	OAC rule 3745-31-05(D) (PTI 03-16310 issued June 2, 2005)	21.0 tons of VOC per rolling 12-month period, for tread end cement usage [See b)(2)a.]
c.	OAC rule 3745-31-05(A)(3)	(for tread end cement usage) 18.0 lbs of VOC /hour (for clean-up material usage) 35.2 lbs VOC /day; 6.42 tons VOC /year
d.	OAC rule 3745-21-09(X)(1)	None [See b)(2)b.]
e.	OAC rule 3745-17-11(B)(2)	None [See b)(2)c and b)(2)f.]
f.	OAC rule 3745-17-07 (A)	None [See b)(2)d and b)(2)f.]
g.	OAC rule 3745-17-11(C)	See b)(2)e, c)(2), and c)(3).
h.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014) [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - tread end cement operation' subject to the emission limitations /control requirements specified in this section.]	Table 1 to Subpart XXXX: Option 1 - HAP constituent option; or Option 2 - production-based option See b)(2)h.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Annual emissions shall not exceed 21.0 tons of VOC, based upon a rolling, 12-month summation of the monthly emissions, for tread end cement usage. The emission limitation is based on input restrictions [see c)(1)] for the purpose of establishing federally enforceable limitations below 'significant increase' threshold for "Prevention of Significant Deterioration" (PSD) applicability.

b. This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X)(1) pursuant to OAC rule 3745-21-09(X)(2)(d).

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(2) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

f. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

g. The hourly VOC emission limitation for cement and daily VOC emission limitation for clean-up represent the potential(s) to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

h. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for this emissions unit (see Sections B.2 through B.9).

c) Operational Restrictions

(1) The maximum annual tread end cement usage for this emissions unit shall not exceed 7000 gallons per year, based upon a rolling 12-month summation of the gallon usage. The VOC content of the tread end cement shall not exceed 6.00 pounds per gallon, as applied.
[OAC 3745-77-07(A)(1) and PTI 03-16310]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
[OAC rule 3745-17-11(C)(1) and (2)(b), and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
[OAC rule 3745-17-11(C)(2)(e), and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) Each owner or operator that is required to conduct monthly performance tests, as specified in f)(1), shall maintain records of the results of all monthly tests.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.545(e)]

(2) If the permittee verifies formulation data under the provisions of f)(4), the permittee shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the material.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.545(f)]

(3) The permittee shall collect and record the following information each month for all coating (cement) materials for this emissions unit:

a. the company name or identification for each coating material employed;

b. the volume, in gallons, of each coating material employed;

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

d. the VOC emission rate, in pounds, for each coating material employed [d)(3)b times d)(3)c];

e. the total VOC emission rate from all coating materials employed [summation of d)(3)d], in pounds or tons; and

f. the rolling, 12-month VOC emission rates, i.e. rolling 12-month total of d)(3)e, in tons.

[OAC 3745-77-07(C)(1) and PTI 03-16310]

(4) The permittee shall collect and record the following information each month for all clean-up materials used in this emissions unit:

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

b. the volume, in gallons, of each cleanup material employed;

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

d. the total VOC emission rate, in pounds, for each cleanup material employed [d)(4)b times d)(4)c];

e. the total VOC emission rate from all cleanup materials employed [summation of d)(4)d], in pounds or tons;

f. the total number of days the emissions unit was in operation; and

g. the average daily VOC emission rate for all cleanup materials, [d)(4)e / d)(4)f], in pounds per day; and

h. the annual, year-to-date, VOC emissions, in tons, from all cleanup materials employed [summation of d)(4)e] for each calendar month to date from January to December.

[OAC 3745-77-07(C)(1) and PTI 03-16310]

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
[OAC 3745-17-11(C)(2)(a), and OAC 3745-77-07(C)(1)]

(6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]

(7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
[OAC rule 3745-17-11(C)(2)(c), and OAC 3745-77-07(C)(1)]

(8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
[OAC rule 3745-17-11(C)(2)(d) and (f), and OAC 3745-77-07(C)(1)]

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
[OAC rule 3745-17-11(C)(2)(f) and (g), and OAC 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Once every 6 months, the permittee shall report, as applicable, each monthly average VOC emission rate that exceeds the VOC emission limit per tire specified in b)(1)a. [At the time of permit processing, the permittee is complying under the averaging period of 'calendar month', under 40 CFR 60.546(b).]

In accordance with 40 CFR 60.546(g), the semi-annual reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.546(f)]

(2) Under the provisions of f)(4), if applicable, the permittee shall report annually the formulation data or Method 24 results to verify the VOC content of the water-based materials in use. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

If the material formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the material shall be reported within 30 days of the change. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.546(j)]

(3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the VOC content restriction of c)(1);

b. any exceedances of the cement usage restriction of c)(1);

c. any exceedances of the rolling, 12-month VOC limitation specified in b)(1)b;

d. any exceedances of the daily VOC limitation for clean-up specified in b)(1)c, as shown by records from d)(4)g; and

e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
[OAC 3745-15-03(B)(1)(a) and OAC 3745-15-03(C); and OAC 3745-77-07(C)(1)]

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations 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).
[OAC 3745-77-07(C)(1) and PTI 03-16310]

(4) The permittee shall submit annual reports that summarize the actual annual VOC emissions, in tons, for clean-up material usage in this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-16310]

f) Testing Requirements

(1) The permittee shall conduct the performance test in f)(2) and f)(3) each month, except as provided in f)(4).

40 CFR 60.8(d) does not apply to the monthly performance test procedures required by Subpart BBB. 40 CFR 60.8(f) does not apply when Method 24 is used.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(b)(1) and (a)]

(2) The permittee shall use the following procedure to calculate the total mass of VOC used at the affected facility for the month (M_O) by the following procedure:

a. For systems where cement is delivered in batch or via a distribution system that serves only this emissions unit:

$$M_O = \sum_{i=1}^{a} LC_i \; DC_i \; WO_i$$

Where:

LC = volume of cement material used for a month (liters (gallons))

DC = density of cement material (grams per liter (lb per gallon))

WO = weight fraction of VOC in a cement material

"a" equals the number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility.

b. For systems where cement is delivered via a common distribution system that also serves other affected facilities:

i. Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M):

$$M = \sum_{i=1}^{b} LC_i \; DC_i \; WO_i$$

Where:

LC_i DC_i WO_i as in f)(3)a above.

"b" equals the number of different cements used during the month that are delivered via a common distribution system that also serves other affected or existing facilities.

ii. Determine the fraction (F_O) of M used at the affected facility by comparing the production records and process specifications for the material cemented at the affected facility for the month to the production records and process specifications for the material cemented at all other facilities served by the common distribution system for the month or by another procedure acceptable to the US EPA Administrator.

iii. Calculate the total monthly mass of VOC used at the affected facility for the month (M_O): $M_O = MF_O$

[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(c)(2)]

(3) The permittee shall use the following procedure to determine compliance with the VOC emission per tire limit specified in b)(1)a:

a. Determine the density and weight fraction VOC (including dilution VOC) of each cement from its formulation or by analysis of the cement using 40 CFR 60, Appendix A, Method 24. If a dispute arises where formulation data is used, the Ohio EPA may require the permittee to analyze the cement using Method 24.

b. Calculate the total mass of VOC used at the affected facility for the month (M_O) as specified under f)(2).

c. Determine the total number of tires cemented or sprayed at the affected facility for the month (T_O) by the following procedure: For a tread end cementing operation, T_O equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.

d. Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month (G):

$G = M_O / T_O$

e. Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month (N): N = G
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(d), and (c)(1)]

(4) If the permittee uses only water-based materials (inside and/or outside) containing less than 1.0 percent, by weight, of VOC, the permittee is not required to conduct the monthly performance test in f)(2) and f)(3). In lieu of conducting a monthly performance test, the permittee shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each tread end cement, provided the formulation has not changed during the previous 12 months. If the material formulation changes, formulation data or Method 24 analysis of the new material shall be conducted to determine the VOC content of the material and reported to Ohio EPA within 30 days as required under e)(2) of this permit for this emissions unit, and 40 CFR 60.546(j).
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(b)(4)]

(5) In determining compliance for each tread end cementing operation, the permittee shall include only those tires defined under 40 CFR 60.541(a) when determining T_O.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.543(m)]

(6) Method 24 or formulation data shall be used for the determination of the VOC content of cements (or clean-up materials). In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material as applied in the affected facility.
[OAC 3745-77-07(C)(1), PTI 03-16310, and 40 CFR 60.547(a)(1)]

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

a. Emission Limitation:
18.0 lbs of VOC /hour (for cements)

Applicable Compliance Method:
The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.0 gallons per hour) by the maximum allowable VOC content of the coating (6.00 pounds per gallon).
[OAC 3745-77-07(C)(1) and PTI 03-16310]

b. Emission Limitation:
35.2 lbs of VOC /day (for clean-up solvents)

Applicable Compliance Method:
The daily allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum daily solvent usage rate (5.62 gallons per day) by the maximum VOC content of the material (6.26 pounds per gallon).
[OAC 3745-77-07(C)(1) and PTI 03-16310]

c. Emission Limitation:
6.42 tons VOC /year (for clean-up solvents)

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(4)e.
[OAC 3745-77-07(C)(1) and PTI 03-16310]

d. Emission Limitation:
21.0 tons VOC per rolling, 12-month period, for tread end cement usage

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(3).
[OAC 3745-77-07(C)(1) and PTI 03-16310]

g) Miscellaneous Requirements

(1) This emissions unit is subject to Subpart BBB of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

(2) Section B (the "Air Toxics Policy" evaluation) of PTI 03-16310 is no longer applicable, due to applicability of MACT Subpart XXXX for this emissions unit.

5. P135

Operations, Property and/or Equipment Description:

Banbury Mixer 1 (27)

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 03-7432 as modified August 5, 2003)	1.20 lbs particulate emissions (PE) /hour; 5.26 tons PE /year 1.61 lbs of organic compounds (OC) /hour, 7.03 tons OC /year
b.	OAC rule 3745-17-11 (B)	None [See b)(2)a.]
c.	OAC rule 3745-17-07 (A)	None [See b)(2)b.]
d.	OAC rule 3745-21-07 (G)	See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

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, i.e. this emissions unit does not employ, apply, evaporate or dry liquid organic materials.

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S.

EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

d. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) 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(s) serving each 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 emission incident; and,

e. any corrective actions taken to eliminate the abnormal visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-7432]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-7432]

f) Testing Requirements

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

a. Emission Limitation:
1.20 lb PE /hour; 5.26 tons PE /year

Applicable Compliance Method:
Compliance with the lb/hr limitation(s) may be determined by multiplying the maximum baghouse outlet concentration of 0.00018 gr/dscf by the baghouse's maximum volumetric air flow rate (16,250 acfm), then multiplying by lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 - 5.
[OAC 3745-77-07(C)(1) and PTI 03-7432]

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

b. Emission Limitation:
1.61 lbs of OC /hour; 7.03 tons OC /year

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 41,583 lbs/hour and an emission factor of 3.86×10^{-5} lb of OC /lb of rubber processed (AP-42 Section 4.12-11 [6/99 Draft]).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.

The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.
[OAC 3745-77-07(C)(1) and PTI 03-7432]

g) Miscellaneous Requirements

(1) None.

6. P147

Operations, Property and/or Equipment Description:

Twin-Two Calender Line

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) g)(1).

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 03-13915 as modified on November 12, 2002)	1.42 lbs organic compounds (OC) /hour; 6.22 tons OC /year
b.	OAC rule 3745-21-07 (G)	See b)(2)a.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

b. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

Emission Limitation:
1.42 lbs OC /hour; 6.22 tons OC /year

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 5,127 lbs/hour and the following emission factors:

Milling: 1.10×10^{-4} lb of OC /lb of rubber milled (AP-42 Section 4.12 [6/99]) x 2 mills

Calendering: 5.59×10^{-5} lb of OC /lb of rubber calendered (AP-42 Section 4.12 [6/99])

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.
[OAC 3745-77-07(C)(1) and PTI 03-13915]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxics 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.

* Only compounds / pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

7. P150

Operations, Property and/or Equipment Description:

Cold Feed Pin Barrel Tread Line

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 03-16093 issued April 15, 2004)	1.31 lbs organic compounds (OC) /hour; 5.74 tons OC /year
b.	OAC rule 3745-21-07 (G)	See b)(2)a.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

b. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

Emission Limitation:
1.31 lbs OC /hour; 5.74 tons OC /year

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 14,544 lbs/hour and an emission factor of 9.0×10^{-5} based on an April 2002 stack test.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

g) Miscellaneous Requirements

(1) None.

8. P200

Operations, Property and/or Equipment Description:

Z Calender with mill and extruder (formerly Z084)

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) d)(1).

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 paragraph 3745-31-05(A)(3), as effective 11/30/01 (PTI P0106694 issued August 10, 2010)	2.10 lbs volatile organic compounds VOC) /hr, 9.20 tons VOC /yr See b)(2)a.
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 63 Subpart XXXX	See b)(2)c.
d.	OAC 3745-21-09(X)	See b)(2)d.
e.	OAC rule 3745-21-07 (G)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/controls measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The PTE for this emissions unit is 9.20 tons of VOC per year based on a maximum hourly throughput of 11,997 lbs of rubber, a maximum operating schedule of 8760 hours per year, and the following emission factors:

Process	Emission Factor (lb of VOC/lb of rubber processed)	Emission Factor Citation
Calendering	0.0000559	AP-42 Section 4.12, Table 4.12-3 (11/08 Draft)
Milling	0.000110	AP-42 Section 4.12, Table 4.12-3 (11/08 Draft)
Extrusion	0.00000937	AP-42 4.12-11 (06/99 Draft)

c. This emissions unit does not involve operations which are considered affected sources covered by 40 CFR Part 63, Subpart XXXX. Emissions unit P200 involves calendering, extruding, and milling operations. The calendering operations do not use solvent and the extruding operations do not use solvent or cement and as such in accordance with 40 CFR 63.5982(b)(1) these operations are not considered affected sources that are covered by 40 CFR Part 63, Subpart XXXX. Additionally, the milling operations associated with this emissions unit are not considered affected sources in accordance with 40 CFR 63.5982(b)(4).

d. This emissions unit is not subject to any requirements under OAC rule 3745-21-09(X).

e. This emissions unit is exempt from the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

The hourly VOC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Modeling to demonstrate compliance with the "Air Toxic Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
[OAC 3745-77-07(C)(1) and PTI P0105578]

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

Emission Limitation:
2.10 lbs VOC /hour; 9.20 tons OC /year

Applicable Compliance Method:
The hourly emission limitation for this emissions unit was based on a maximum hourly throughput of 11,997 lbs of rubber, and each of the emission factors as in b)(2)b.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None

9. R012

Operations, Property and/or Equipment Description:

Tread Marking Operation (Roll Coating, Drip /Smear)

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 03-17056 issued August 3, 2006)	For Tread Marking: 2.46 lbs of organic compounds (OC) /hour 5.16 tons of OC per rolling 12-month period For Cleanup Operations: 265 lbs of OC /month; 1.59 tons of OC /year See c)(1) and c)(2).
b.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014) [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - ink and finish operations' subject to the emission limitations /control requirements specified in this section.]	Table 1 to Subpart XXXX: Option 1 - HAP constituent option; or Option 2 - production-based option See b)(2)a.
c.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-21-07(G)(2)	See b)(2)b, c)(2), and c)(3).
e.	OAC rule 3745-21-09(X)	See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for this emissions unit (see Sections B.2 through B.9).

b. The emissions limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions [see c)(2)] and therefore are not considered volatile organic compounds as defined in OAC 3745-21-01 and 40 CFR 51.100(s).

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: c)(3), d)(1)f, d)(2)e, and e)(2).

c. This emissions unit (tread marking operation) is not subject to any requirements under OAC rule 3745-21-09(X), or NSPS Subpart BBB.

d. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The OC content of the coating (ink) shall not exceed 7.00 pounds per gallon, as applied.
[OAC 3745-77-07(A)(1) and PTI 03-17056]

(2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.
[OAC 3745-77-07(A)(1) and PTI 03-17056]

(3) The use of photo-chemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
[OAC 3745-77-07(A)(1) and PTI 03-17056]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for coating operations in this emissions unit:

a. The company identification for each coating (ink) employed.

b. The number of gallons of each coating (ink) employed.

c. The OC content of each coating (ink) employed, in pounds per gallon.

d. The total OC emission rate for all coatings (inks) employed, in pounds [summation of d)(1)b x d)(1)c, for each coating (ink)].

e. The rolling, 12-month summation of monthly OC emissions, in tons.

f. Documentation of whether or not each coating (ink) employed is a photochemically reactive material.

[OAC 3745-77-07(C)(1) and PTI 03-17056]

(2) The permittee shall collect and record the following information each month for cleanup operations in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material employed, in pounds per gallon.

d. The total OC emission rate for all cleanup materials employed, in pounds [summation of d)(2)b x d)(2)c, for each clean-up material].

e. Documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), or is a photochemically reactive material.

[OAC 3745-77-07(C)(1) and PTI 03-17056]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. any exceedances of the rolling, 12-month OC limitation for coating (ink) specified in b)(1)a;

b. any exceedances of the monthly OC limitation for clean-up specified in b)(1)a; and

c. any exceedances of the OC content limit for coatings (inks) in c)(1).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations 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).
[OAC 3745-77-07(C)(1) and PTI 03-17056]

(2) The permittee shall notify the Northwest District Office in writing of any daily record showing the use of any photochemically reactive materials in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District

Office within 45 days after the event occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-17056]

(3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-17056]

f) Testing Requirements

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

a. Emission Limitation:
2.46 lbs OC /hour (for coating)

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings (inks) usage rate (0.35 gallons per hour) by the maximum allowable VOC content of the coating (7.00 pounds per gallon).
[OAC 3745-77-07(C)(1) and PTI 03-17056]

b. Emission Limitation:
5.16 tons of OC /year (rolling 12-month average) - for coating

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(1)e.
[OAC 3745-77-07(C)(1) and PTI 03-17056]

c. Emission Limitation:
265 lbs of OC /month; 1.59 tons of OC /year (for clean-up)

Applicable Compliance Method:
Compliance with the monthly OC limit shall be based on the record keeping requirements as specified in d)(2)d.
[OAC 3745-77-07(C)(1) and PTI 03-17056]

The annual allowable limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, as long as compliance with the monthly limitation is shown, compliance with the annual limitation shall be assumed.
[OAC 3745-77-07(C)(1) and PTI 03-17056]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the OC/VOC contents of all coating / ink / clean-up materials employed.

[OAC 3745-77-07(C)(1) and PTI 03-17056]

g) Miscellaneous Requirements

(1) The original Permit to Install (PTI) 03-11017 issued April 22, 1998 for this emissions unit, established at that time an organic compound (OC) limit [effectively limiting also VOCs] of 5.16 tons of OC per year, for purposes of facility-wide VOC Potential to Emit (PTE) of under the 250 tons per year Major Source threshold.

10. Emissions Unit Group - Group A - P136, P137, P140

EU ID	Operations, Property and/or Equipment Description
P136	Banbury Mixer 4 (Final/Silica)
P137	Banbury Mixer 3 (Master/Final/Silica)
P140	Banbury Mixer 5 (Final/Silica)

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) d)(3) through d)(6).

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 03-16093 issued April 15, 2004)	0.15 lb particulate emissions (PE) /hour; 0.66 ton PE /year (each emissions unit) Visible PE shall not exceed 10 percent opacity, as a six-minute average 11.3 lbs of organic compounds (OC) /hour (each emissions unit) 60.0 tons OC /year (for emissions units P136, P137, and P140 combined) [See b)(2)a and b)(2)g.] Control requirements [See b)(2)b.]
b.	OAC rule 3745-17-11 (B)	None [See b)(2)c.]
c.	OAC rule 3745-17-07 (A)	None [See b)(2)d.]
d.	OAC rule 3745-21-07 (G)	See b)(2)e.
e.	40 CFR Part 63, Subpart XXXX	See b)(2)f.

(2) Additional Terms and Conditions

a. The annual limitation represents potential emissions from emissions unit Group A - P136, P137, and P140, based on inherent physical limitations associated with the production of mixed rubber. These emissions units are used to produce mixed rubber (both regular and silica rubber) which is utilized in subsequent manufacturing processes for the production of pneumatic tires. The production

of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, organic emissions are physically limited to 60.0 tons per year from this emissions unit group.

b. The "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse control system with a 95% removal efficiency.

c. The uncontrolled mass rate of particulate emissions from each emissions unit is less than 10 lbs / hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Paulding County.

d. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. These emissions units are 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, i.e. this emissions unit does not employ, apply, evaporate or dry liquid organic materials.

f. Pursuant to 40 CFR 63.5982(B)(4), there are no emission limitations or other requirements for the "rubber processing" affected sources of 40 CFR 63 Subpart XXXX.

g. The hourly OC emission limitation represents the potential to emit for each emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

h. All OCs are assumed to be volatile organic compounds (VOCs).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:

a. Identification of each type of mixing operation performed (master mixing, final mixing, 2nd pass silica mixing, or 3rd pass silica mixing);

b. Amount of rubber, in pounds, mixed for each type of mixing operation;

c. Calculated OC emissions from each type of mixing operation using the following equation:

lbs OC emissions = (lbs of rubber mixed) x (OC emission factor* in lbs OC/lb rubber)

* OC emission factors from AP-42, Section 4.12 and from stack testing performed by the company shall be used in the emission calculation.

d. Total OC emissions from all mixing operations, in pounds [summation of d)(1)c for all types of mixing operations]; and

e. The annual, year to date OC emissions from all mixing operations [summation of d)(1)d, from January to December).

[OAC 3745-77-07(C)(1) and PTI 03-16093]

(2) 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(s) serving each 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 emission incident; and,

e. any corrective actions taken to eliminate the abnormal visible emissions.

[OAC 3745-77-07(C)(1) and PTI 03-16093]

(3) The permit to install for this emissions unit group was evaluated based on the actual materials (typically coatings and cleanup 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):

Pollutant: ethanol
TLV (µg /m3): 1,884,000
Maximum Hourly Emission Rate (lbs/hour): 15.81*
Predicted 1-Hour Maximum Ground-Level Concentration (µg /m3): 4902
MAGLC (µg /m3): 44,860

* maximum emissions rate for emissions units P136, P137, and P140, combined
[OAC 3745-77-07(C)(1) and PTI 03-16093]

(4) 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.).

* Only compounds / pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

[OAC 3745-77-07(C)(1) and PTI 03-16093]

(5) 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.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

(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.

[OAC 3745-77-07(C)(1) and PTI 03-16093]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the actual annual OC emissions, in tons, for emissions units P136, P137, and P140, combined. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after the effective date of this permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s) for PE: 40 CFR, Part 60, Appendix A, Methods 1 - 5.

d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

[OAC 3745-77-07(C)(1]

(2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such

notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).
[OAC 3745-77-07(C)(1)]

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

a. Emission Limitation:
11.3 lbs OC /hour (each emissions unit)

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit, and is based on a maximum hourly rubber throughput of 5400 lbs/hour and an emission factor of 2.1×10^{-3} based on an April 2002 stack test.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on Methods 18, 25, 25a, as appropriate, of 40 CFR Part 60.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

b. Emission Limitation:
60.0 tons OC /year (for emissions units P136, P137, and P140 combined)

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in d)(1)e.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

c. Emission Limitation:
0.15 lb PE /hour; 0.66 ton PE /year (each emissions unit)

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing. [See f)(1) and f)(2)]

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

d. Emission Limitation:
Visible PE shall not exceed 10 percent opacity, as a six-minute average

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.
[OAC 3745-77-07(C)(1) and PTI 03-16093]

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group - Group B - P216, P217: P216, P217,

EU ID	Operations, Property and/or Equipment Description
P216	Tire Inspection and Repair Station 1 (formerly Z002)
P217	Tire Inspection and Repair Station 2 (formerly Z003)

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.	40 CFR Part 63, Subpart XXXX (40 CFR 63.5980-6014) [In accordance with 40 CFR 63.5982(b)(1), this emissions unit is an existing 'tire production affected source - ink and finish operations' subject to the emission limitations /control requirements specified in this section.]	Table 1 to Subpart XXXX: Option 1 - HAP constituent option; or Option 2 - production-based option See b)(2)a.
b.	40 CFR 63.1-15 (40 CFR 63.6013)	Table 1 to Subpart XXXX of 40 CFR Part 63 – Applicability of General Provisions to Subpart XXXX shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-21-07 (G)	None [See b)(2)b.]

(2) Additional Terms and Conditions

a. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart XXXX requirements for these emissions units (see Sections B.2 through B.9).

b. This facility is not located in a "Priority I" county (it is located in Hancock County) as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.