State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

08/10/04

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-87-02-0045
Cooper Standard Automotive, LLC
Stacey L. Rader
1175 North Main Street
Bowling Green, OH 43402

Dear Stacey L. Rader:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Northwest District Office.

Sincerely,

Michael W. Ahern

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **08/10/04**	Effective Date: **08/31/04**	Expiration Date: **08/31/09**

This document constitutes issuance of a Title V permit for Facility ID: 03-87-02-0045 to:
Cooper Standard Automotive, LLC
1175 North Main Street
Bowling Green, OH 43402

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P003 (EU-CC#2 Rubber Processing Operations)
Cascade Line #2 Extruders, Rubber Curing Oven, Hot Wash

P005 (EU-CC#3 Rubber Processing Operations)
Cascade Line #3 Extruders, Rubber Curing Oven, Hot Wash

P008 (EU-DD#3 Coating Cure Oven)
Dual Durometer Line #3 Coating Cure Oven

P010 (EU-DD#1 Coating Cure Oven)
Dual Durometer Line #1 Coating Cure Oven

P011 (EU-DD#2 Coating Cure Oven)
Dual Durometer Line #2 Coating Cure Oven

P012 (EU-FL#1 Rubber Processing Operations)
Flock Line #1 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P014 (EU-FL #1 Coating Cure Oven)
Flock Line #1 Coating Cure Oven

P015 (EU-DD#5 Coating Cure Oven)
Dual Durometer Line #5 Coating Cure Oven

P016 (EU-FL#2 Rubber Processing Operations)
Flock Line #2 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P018 (EU-FL #2 Coating Cure Oven)
Flock Line #2 Coating Cure Oven

P019 (EU-FL#3 Rubber Processing Operations)
Flock Line #3 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P021 (EU-FL #3 Coating Cure Oven)
Flock Line #3 Coating Cure Oven

P023 (EU-DD#6 Rubber Processing Operations)
Dual Durometer Line #6 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling, Plastic Extruder

P024 (EU-DD#6 Coating Cure Oven 1)
Dual Durometer Line #6 Coating Cure Oven 1 (for Spray Booth #1)

P025 (EU-DD#6 Coating Cure Oven 2)
Dual Durometer Line #6 Coating Cure Oven 2 (for Spray Booth #3)

P026 (EU-DD#7 Rubber Processing Operations)
Dual Durometer Line #7 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P028 (EU-DD#8 Rubber Processing Operations)
Dual Durometer Line #8 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P037 (EU-DD#9 Coating Cure Oven)
Dual Durometer Line #9 Coating Cure Oven

P038 (EU-CC#1 Rubber Processing Operations)
Cascade Line #1 Extruders, Rubber Curing Oven, Hot Wash, IR Oven

P039 (EU-CC #1 Coating Cure Oven)
Cascade Line #1 Coating Cure Oven

P044 (EU-FL #4 Coating Cure Oven)
Flock Line #4 Coating Cure Oven

P046 (EU-DD#9 Rubber Processing Operations)
Dual Durometer Line #9 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P049 (EU-FL#4 Rubber Processing Operations)
Flock Line #4 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P050 (EU-DD#1 Rubber Processing Operations)
Dual Durometer Line #1 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P051 (EU-DD#2 Rubber Processing Operations)
Dual Durometer Line #2 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P052 (EU-DD#3 Rubber Processing Operations)
Dual Durometer Line #3 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P053 (EU-DD#4 Rubber Processing Operations)
Dual Durometer Line #4 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P054 (EU-DD#5 Rubber Processing Operations)
Dual Durometer Line #5 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

P055 (EU-CC #2 Coating Cure Oven 1)
Cascade Line #2 Coating Cure Oven 1

P056 (EU-CC #2 Coating Cure Oven 2)
Cascade Line #2 Coating Cure Oven 2

P057 (EU-CC #3 Coating Cure Oven 1)
Cascade Line #3 Coating Cure Oven 1

P058 (EU-CC #3 Coating Cure Oven 2)
Cascade Line #3 Coating Cure Oven 2

P067 (EU-DD#4 Coating Cure Oven)
Dual Durometer Line #4 Coating Cure Oven

R002 (EU-DD#3 Coating/Printing Operations)
Dual Durometer Line #3 Spray Booth

R003 (EU-DD#4 Coating/Printing Operations)
Dual Durometer Line #4 Spray Booth

R004 (EU-OLSB Coating/Printing Operations)
Off Line Spray Booth

R005 (EU-DD#1 Coating/Printing Operations)
Dual Durometer Line #1 Spray Booth

R006 (EU-DD#2 Coating/Printing Operations)
Dual Durometer Line #2 Spray Booth

R007 (EU-CC#3 Coating/Printing Operations)
Cascade Line #3 Spray Booth

R008 (EU-FL#1 Coating/Printing Operations)
Flock Line #1 Adhesive Booth, Flocking Room

R009 (EU-CC#2 Coating/Printing Operations)
Cascade Line #2 Spray Booth

R011 (EU-FL#2 Coating/Printing Operations)
Flock Line #2 Adhesive Booth, Flocking Room

R012 (EU-FL#3 Coating/Printing Operations)
Flock Line #3 Adhesive Booth, Flocking Room

R013 (EU-DD#6 Coating/Printing Operations)
Dual Durometer Line #6 Spray Booth #1

R014 (EU-DD#7 Coating/Printing Operations)
Dual Durometer Line #7 Spray Booth

R015 (EU-DD#8 Coating/Printing Operations)
Dual Durometer Line #8 Spray Booth

R016 (EU-DD#6 Coating/Printing Operations 2)
Dual Durometer Line #6 Spray Booth #2

R017 (EU-DD#6 Coating/Printing Operations 3)
Dual Durometer Line #6 Spray Booth #3

R020 (EU-DD#5 Coating/Printing Operations)
Dual Durometer Line #5 Spray Booth

R024 (EU-DD#9 Coating/Printing Operations)
Dual Durometer Line #9 Spray Booth

R026 (EU-CC#1 Coating/Printing Operations)
Cascade Line #1 Spray Booth

R029 (EU-FL#4 Coating/Printing Operations)
Flock Line #4 Adhesive Booth, Flocking Room

R030 (EU-CC #2 Coating/Printing Operations 2)
Cascade Line #2 Spray Booth #2

R031 (EU-CC #3 Coating/Printing Operations 2)

Cascade Line #3 Spray Booth #2

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. 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:

i. **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 by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

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

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

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II 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 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 reports shall satisfy the requirements (in part) 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. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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 overrides the reporting requirements specified in this General 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 the requirements (in part) 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **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 General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted 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.

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 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 General Term and Condition A.1.c.ii 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))

iv. 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))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. 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 General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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))

4. 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))

5. 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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. 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:

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

13. 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))

14. 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))

15. 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))

16. 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. 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))

17. 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.)

18. Insignificant Activities

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

19. 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))

20. 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))

21. 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 by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If 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 monitoring, record keeping, reporting, or testing 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.

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 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 General Term and Condition A.1.c.ii;

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; and

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. Until May 3, 2002, the permittee was required to investigate and research the feasibility of utilizing either: (1) non-photochemically reactive adhesives or (2) adhesives with a VOC content of less than 3.60 pounds VOC/gallon to be employed in flock lines numbers 1, 2 and 3. This investigation and research requirement expired two years after the final issuance of PTI No. 03-11229 (issued May 3, 2000). The permittee did submit detailed reports on the progress of their research to develop non-photochemically reactive or low VOC content adhesives.

These reports included the following information:

a. the name, contact name and telephone number of the supplier contacted for compliant adhesives;

b. the adhesive name and identification for any adhesive that was investigated for potential use;

c. a description of any trials conducted including the date, amount of adhesive used and duration of the trial;

d. a discussion of the results of the trial, including a description of the reason(s) why any adhesive failed; and

e. the date when any approved adhesive was put into production.

These reports were submitted to Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402 and to U.S. EPA, Region V, Permits and Grants Section, Air Programs Branch, (5AR-18J), 77 West Jackson Boulevard, Chicago, Illinois, 60604. The reports were submitted annually. The first report was due one year from the date the final permit was issued (May 3, 2001), and the final report was due two years from the date the final permit was issued (May 3, 2002).

2. The following insignificant emissions units are located at this facility:

abrasive blasting units (maintenance area, molds), emissions unit Z001;
finishing area (coating, ink, adhesive, lubricants), emissions unit Z002;
injection molding presses, emissions unit Z003;
fuel oil storage tank- 1000 gallons, emissions unit Z004;
parts washers- aqueous-based cleaner, emissions unit Z005; and
misc. line oper. (mastic, 'dotter', slip coat, lube), emissions unit Z006.

Each insignificant emissions unit 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. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC#2 Rubber Processing Operations (P003)

Activity Description: Cascade Line #2 Extruders, Rubber Curing Oven, Hot Wash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #2 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	1.74 pounds volatile organic compounds (VOC)/hour and 7.6 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 1.74 pound and the annual VOC limitation of 7.6 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:
1.74 pounds VOC/hour, 7.6 tons VOC/year

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 2100 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 2100 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #2 for rubber curing & extruding	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC#3 Rubber Processing Operations (P005)

Activity Description: Cascade Line #3 Extruders, Rubber Curing Oven, Hot Wash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #3 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	1.74 pounds volatile organic compounds (VOC)/hour and 7.6 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 1.74 pound and the annual VOC limitation of 7.6 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:
1.74 pounds VOC/hour, 7.6 tons VOC/year

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 2100 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 2100 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #3 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#3 Coating Cure Oven (P008)

Activity Description: Dual Durometer Line #3 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #3 oven #3	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.19 pound organic compounds (OC)/hour
		See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.29 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(3).

2.b There are no OC emission limitations established for this emissions unit because no photochemically reactive materials are employed in the spray booth associated with this emissions unit and no liquid organic material or any substance containing liquid organic materials comes into contact with a flame, or is baked, heat cured, or heat polymerized in the presence of oxygen in this emissions unit.

2.c For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R002), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9391.

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.

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

1. The OC emissions from the liquid organic materials used in this emissions unit shall not exceed 0.29 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions.

Compliance with the annual emission limitation for OC from the use of liquid organic materials shall be based upon a rolling, 12-month summation of the monthly emissions.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R002 (see section A.III of emissions unit R002), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R002 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and,

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and,

b. the rolling, 12-month OC emission rate, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.19 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.29 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.19 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.29 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#1 Coating Cure Oven (P010)

Activity Description: Dual Durometer Line #1 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #1 oven #2	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.08 pound organic compounds (OC)/hour See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.23 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(3).

2.b There are no OC emission limitations established for this emissions unit because no photochemically reactive materials are employed in the spray booth associated with this emissions unit and no liquid organic material or any substance containing liquid organic materials comes into contact with a flame, or is baked, heat cured, or heat polymerized in the presence of oxygen in this emissions unit.

2.c For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R005), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9391.

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.

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

1. The OC emissions from the liquid organic materials used in this emissions unit shall not exceed 0.23 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions.

Compliance with the annual emission limitation for OC from the use of liquid organic materials shall be based upon a rolling, 12-month summation of the monthly emissions.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R005 (see section A.III of emissions unit R005), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R005 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.08 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.23 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.08 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.23 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#2 Coating Cure Oven (P011)

Activity Description: Dual Durometer Line #2 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #2 oven #3	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.19 pound organic compounds (OC)/hour
		See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.43 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(3).

2.b There are no OC emission limitations established for this emissions unit because no photochemically reactive materials are employed in the spray booth associated with this emissions unit and no liquid organic material or any substance containing liquid organic materials comes into contact with a flame, or is baked, heat cured, or heat polymerized in the presence of oxygen in this emissions unit.

2.c For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R006), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9391.

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.

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

1. The OC emissions from the liquid organic materials used in this emissions unit shall not exceed 0.43 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions.

Compliance with the annual emission limitation for OC from the use of liquid organic materials shall be based upon a rolling, 12-month summation of the monthly emissions.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R006 (see section A.III of emissions unit R006), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R006 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.19 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.43 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.19 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.43 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#1 Rubber Processing Operations (P012)

Activity Description: Flock Line #1 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #1 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #1 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL #1 Coating Cure Oven (P014)

Activity Description: Flock Line #1 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #1, hot air cure oven #2 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when the permittee is not employing any photochemically reactive materials in emissions unit R008, the organic compound (OC) emissions (for emissions units R008 and P014, combined) shall not exceed 86.64 pounds/day On the days when the permittee is employing a photochemically reactive material in emissions unit R008, see Section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E).
	OAC rule 3745-21-07(G)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)
	OAC rule 3745-17-11(B)	See section A.I.2.e.
	OAC rule 3745-17-07(A)	See section A.I.2.f.
	OAC rule 3745-31-05(D) PTI No. 03-11229	The total OC emissions for emissions units R008 and P014, combined, shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation.

2. Additional Terms and Conditions

2.a On the days when the permittee is employing any photochemically reactive material in emissions unit R008, the VOC content of each adhesive coating employed in emissions units R008 and P014 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]

2.b In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-11229.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.f 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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R008 and P014, combined:

a. the company identification for each coating material employed;

b. a determination of whether or not each coating material employed is a photochemically reactive material;

c. on the days when no photochemically reactive materials are employed in emissions unit R008, the number of gallons of each coating employed;

d. on the days when no photochemically reactive materials are employed in emissions unit R008, the OC content of each coating employed, in pounds per gallon, as applied;

e. on the days when no photochemically reactive materials are employed in emissions unit R008, the OC emission rate for each coating employed (c x d), in pounds;

f. on the days when no photochemically reactive materials are employed in emissions unit R008, the total OC emission rate for all the coatings employed (the summation of "e" for all the coatings), in pounds; and

g. on the days when any photochemically reactive material is employed in emissions unit R008, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R008 and P014, combined:

a. the company identification for each liquid organic material employed;

b. the number of gallons of each liquid organic material employed;

c. the OC content of each liquid organic material employed, in pounds/gallon;

d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and

e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when no photochemically reactive materials were employed in emissions unit R008, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R008 and P014, combined);

b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R008 and P014, combined); and

c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

1.c VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coating materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #1, hot air cure oven #2 and cooling conveyor	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R008 and P014 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#5 Coating Cure Oven (P015)

Activity Description: Dual Durometer Line #5 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #5 oven #3	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.08 pound organic compounds (OC)/hour
		See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.22 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).

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

2.c For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R020), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9391.

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.

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R020 (see section A.III of emissions unit R020), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R020 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.08 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.22 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.08 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.22 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#2 Rubber Processing Operations (P016)

Activity Description: Flock Line #2 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #2 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G), because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA) . The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #2 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL #2 Coating Cure Oven (P018)

Activity Description: Flock Line #2 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #2, hot air cure oven #2 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when the permittee is not employing any photochemically reactive materials in emissions unit R011, the organic compound (OC) emissions (for emissions units R011 and P018, combined) shall not exceed 86.64 pounds/day The total OC emissions for emissions units R011 and P018, combined, shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation On the days when the permittee is employing a photochemically reactive material in emissions unit R011, see Section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E).
	OAC rule 3745-21-07(G)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)
	OAC rule 3745-17-11(B)	See section A.I.2.e.
	OAC rule 3745-17-07(A)	See section A.I.2.f.

2. Additional Terms and Conditions

2.a On the days when the permittee is employing any photochemically reactive material in emissions unit R011 , the VOC content of each adhesive coating employed in emissions units R011 and P018 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]

2.b In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-11229.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.f 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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R011 and P018, combined:

a. the company identification for each coating material employed;

b. a determination of whether or not each coating material employed is a photochemically reactive material;

c. on the days when no photochemically reactive materials are employed in emissions unit R011, the number of gallons of each coating employed;

d. on the days when no photochemically reactive materials are employed in emissions unit R011, the OC content of each coating employed, in pounds per gallon, as applied;

e. on the days when no photochemically reactive materials are employed in emissions unit R011, the OC emission rate for each coating employed (c x d), in pounds;

f. on the days when no photochemically reactive materials are employed in emissions unit R011, the total OC emission rate for all the coatings employed (the summation of "e" for all the coatings), in pounds; and

g. on the days when any photochemically reactive material is employed in emissions unit R011, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R011 and P018, combined:

a. the company identification for each liquid organic material employed;

b. the number of gallons of each liquid organic material employed;

c. the OC content of each liquid organic material employed, in pounds/gallon;

d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and

e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when no photochemically reactive materials were employed in emissions unit R011, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R011 and P018, combined);

b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R011 and P018, combined); and

c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

1.c VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coating materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #2, hot air cure oven #2 and cooling conveyor	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R011 and P018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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 (note: screening scenario identical to that for P014 and R008) 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#3 Rubber Processing Operations (P019)

Activity Description: Flock Line #3 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #3 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA) . The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #3 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL #3 Coating Cure Oven (P021)

Activity Description: Flock Line #3 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #3, hot air cure oven #2 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when the permittee is not employing any photochemically reactive materials in emissions unit R012, the organic compound (OC) emissions (for emissions units R012 and P021, combined) shall not exceed 86.64 pounds/day The total OC emissions for emissions units R012 and P021, combined, shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation On the days when the permittee is employing a photochemically reactive material in emissions unit R012, see Section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E).
	OAC rule 3745-21-07(G)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)
	OAC rule 3745-17-11(B)	See section A.I.2.e.
	OAC rule 3745-17-07(A)	See section A.I.2.f.

2. Additional Terms and Conditions

2.a On the days when the permittee is employing any photochemically reactive material in emissions unit R012, the VOC content of each adhesive coating employed in emissions units R012 and P021 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]

2.b In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-11229.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.f 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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R012 and P021, combined:

a. the company identification for each coating material employed;

b. a determination of whether or not each coating material employed is a photochemically reactive material;

c. on the days when no photochemically reactive materials are employed in emissions unit R012, the number of gallons of each coating employed;

d. on the days when no photochemically reactive materials are employed in emissions unit R012, the OC content of each coating employed, in pounds per gallon, as applied;

e. on the days when no photochemically reactive materials are employed in emissions unit R012, the OC emission rate for each coating employed (c x d), in pounds;

f. on the days when no photochemically reactive materials are employed in emissions unit R012, the total OC emission rate for all the coatings employed (the summation of "e" for all the coatings), in pounds; and

g. on the days when any photochemically reactive material is employed in emissions unit R012, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R012 and P021, combined:

a. the company identification for each liquid organic material employed;

b. the number of gallons of each liquid organic material employed;

c. the OC content of each liquid organic material employed, in pounds/gallon;

d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and

e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when no photochemically reactive materials were employed in emissions unit R012, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R012 and P021, combined);

b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R012 and P021, combined); and

c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

1.c VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coating materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #3, hot air cure oven #2 and cooling conveyor	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R012 and P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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 (note: screening scenario identical to that for P014 and R008) 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#6 Rubber Processing Operations (P023)

Activity Description: Dual Durometer Line #6 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling, Plastic Extruder

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #6 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA) . The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #6 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#6 Coating Cure Oven 1 (P024)

Activity Description: Dual Durometer Line #6 Coating Cure Oven 1 (for Spray Booth #1)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #6, coating cure oven #1	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.19 pound organic compounds (OC)/hour
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.23 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).

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

2.c For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R013), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9391.

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.

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R013 (see section A.III of emissions unit R013), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R013 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.19 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.23 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.19 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.23 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#6 Coating Cure Oven 2 (P025)

Activity Description: Dual Durometer Line #6 Coating Cure Oven 2 (for Spray Booth #3)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #6, coating cure oven 2	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	0.11 pound organic compounds (OC)/hour
	OAC rule 3745-31-05(D) PTI No. 03-9391	0.08 ton OC/year, based upon a rolling, 12-month summation of the monthly emissions
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.d.
	OAC rule 3745-23-06(B)	See Section A.I.2.d.
	OAC rule 3745-17-10(B)	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).

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

2.c For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (emissions unit R017), the permittee shall utilize a value of 95 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booths is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9391.

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.

2.e The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R017 (see section A.III of emissions unit R017), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings and cleanup materials employed in emissions unit R017 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.11 pound; and,

b. all exceedances of the rolling, 12-month OC emission limitation of 0.08 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.11 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.08 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#7 Rubber Processing Operations (P026)

Activity Description: Dual Durometer Line #7 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #7 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #7 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#8 Rubber Processing Operations (P028)

Activity Description: Dual Durometer Line #8 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #8 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #8 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#9 Coating Cure Oven (P037)

Activity Description: Dual Durometer Line #9 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #9 coating cure oven	OAC rule 3745-31-05(A)(3) PTI No. 03-9822	0.23 pound organic compounds (OC)/hour The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G)(2) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-9822	0.66 ton OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.a.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-17-11(B)	See Section A.I.2.d.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.f.)

2. Additional Terms and Conditions

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

2.b For purposes of calculating the organic compound emission rates for this emissions unit (P037) and the associated spray booth (emissions unit R024), the permittee shall utilize a value of 85 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 15 percent of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the spray booth is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9822.

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.

2.d The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.e 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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R024 (see section A.III of emissions unit R024), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R024 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9822, issued on May 27, 1997: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.23 pound; and

b. all exceedances of the rolling, 12-month OC emission limitation of 0.66 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9822, issued on May 27, 1997: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

0.23 pound OC/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.66 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9822, issued on May 27, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC#1 Rubber Processing Operations (P038)

Activity Description: Cascade Line #1 Extruders, Rubber Curing Oven, Hot Wash, IR Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #1 for rubber curing & extruding	OAC rule 3745-31-05(A)(3) PTI 03-13984	1.74 pounds volatile organic compounds (VOC)/hour and 7.6 tons VOC/year
	OAC rule 3745-31-05(D)	20.8 tons VOC/rolling, 12-month period (See A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 1.74 pound and the annual VOC limitation of 7.6 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:
1.74 pound VOC/hour, 7.6 tons VOC/year

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 2100 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 2100 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation will be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #1 for rubber curing & extruding	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #1 Coating Cure Oven (P039)

Activity Description: Cascade Line #1 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
cascade line #1 coating cure oven	OAC rule 3745-31-05(A)(3) PTI No. 03-9900	0.57 pound organic compounds (OC)/hour 13.7 pounds OC/day The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-9900	0.50 ton OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates
	OAC rule 3745-21-07(G)(3)	See Section A.I.2.a.
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-17-11(B)	See Section A.I.2.d.
	OAC rule 3745-17-07(A)	See Section A.I.2.e.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.f.)

2. Additional Terms and Conditions

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

2.b For purposes of calculating the organic compound emission rates for this emissions unit (P039) and the associated spray booth (emissions unit R026), the permittee shall utilize a value of 85 percent as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 15 percent of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the spray booth is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions unit and the associated spray booth shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-9900.

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.

2.d The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.e 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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.f The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R026 (see section A.III of emissions unit R026), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.b above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R026 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.b) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9900, issued on May 21, 1997: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 0.57 pound;

b. all exceedances of the daily OC emission limitation of 13.7 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 0.50 ton.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9900, issued on May 21, 1997: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

0.57 pound OC/hour
13.7 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations based on the record keeping requirements established in section A.III.1 of this permit.

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

1.b Emission Limitation:

0.50 ton OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9900, issued on May 21, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL #4 Coating Cure Oven (P044)

Activity Description: Flock Line #4 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #4, coating cure oven #1 and cooling conveyor	OAC rule 3745-31-05(A)(3) PTI No. 03-10454	The organic compound (OC) emissions (for emissions units R029 and P044, combined) shall not exceed 77.1 pounds/day, from the adhesive coatings usage. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-18-06(E).
	OAC rule 3745-21-07(G)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.a.]
	OAC rule 3745-23-06(B)	See Section A.I.2.b.
	OAC rule 3745-21-08(B)	See Section A.I.2.b.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.c.)
	OAC rule 3745-17-11(B)	See section A.I.2.d.
	OAC rule 3745-17-07(A)	See section A.I.2.e.
	OAC rule 3745-31-05(D) PTI No. 03-10454	The total OC emissions (for emissions units R029 and P044, combined) shall not exceed 7.3 tons OC/year, based upon a rolling, 12-month summation, from the adhesive coatings usage.

2. Additional Terms and Conditions

2.a In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

2. Additional Terms and Conditions (continued)

2.b The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-0454.

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.

2.c The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.d The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.e 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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R029 and P044, combined:

a. the company identification for each adhesive coating employed;

c. the number of gallons of each adhesive coating employed;

d. the OC content of each adhesive coating employed, in pounds per gallon;

e. the OC emission rate for each adhesive coating employed (c x d), in pounds; and

f. the total OC emission rate for all the adhesive coatings employed (the summation of e for all adhesive coatings), in pounds.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R029 and P044, combined:

a. the total OC emission rate for all the adhesive coatings employed, in pounds (calculated by summing the daily OC emission rates, from section A.III.1.f, for the calendar month; and

b. the rolling, 12-month OC emission rate for all the adhesive coatings employed, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10454, issued on September 10, 1998: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. all exceedances of the daily OC emission limitation of 77.1 pounds (for emissions units R029 and P044, combined); and

b. all exceedances of the rolling, 12-month OC emission limitation of 7.3 tons (for emissions units R029 and P044, combined).

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10454, issued on September 10, 1998: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

77.1 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

7.3 tons OC/rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-10454, issued on September 10, 1998: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #4, coating cure oven #1 and cooling conveyor	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P044 and R029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#9 Rubber Processing Operations (P046)

Activity Description: Dual Durometer Line #9 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #9 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #9 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#4 Rubber Processing Operations (P049)

Activity Description: Flock Line #4 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #4 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #4 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#1 Rubber Processing Operations (P050)

Activity Description: Dual Durometer Line #1 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #1 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #1 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#2 Rubber Processing Operations (P051)

Activity Description: Dual Durometer Line #2 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #2 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #2 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#3 Rubber Processing Operations (P052)

Activity Description: Dual Durometer Line #3 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #3 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #3 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#4 Rubber Processing Operations (P053)

Activity Description: Dual Durometer Line #4 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #4 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #4 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#5 Rubber Processing Operations (P054)

Activity Description: Dual Durometer Line #5 Extruders, Rubber Curing Oven, Carrier Heater, Portable Heat Guns, Cooling

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #5 for rubber curing and extrusion	OAC rule 3745-31-05(A)(3) PTI 03-13984	0.99 pound volatile organic compounds (VOC)/hour, 4.3 tons VOC/year
	OAC rule 3745-31-05(D) PTI 03-13984	20.8 tons VOC/rolling, 12-month period (See Section A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable VOC emission limitation (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined) of 20.8 tons VOC per rolling, 12-month period, based on production restrictions, for purposes of maintaining PSD minor facility status (see Section A.II.1).

2.b The emissions unit is not subject to the requirements of OAC rule 3745-21-07(G) because no liquid organic material, as defined in OAC rule 3745-21-01(C)(3), is employed.

2.c The hourly VOC limitation of 0.99 pound and the annual VOC limitation of 4.3 tons are established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined, shall not exceed 25,000 tons of rubber per year, based on a rolling, 12-month summation of the monthly rubber production rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate for all the rubber cured and extruded, in tons, calculated as follows:

i. multiply the quantity of rubber cured, from section A.III.1.a above, by the emission factor of 0.000825 pound VOC/pound of rubber cured;*

ii. multiply the quantity of rubber extruded, from section A.III.1.a above, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded;* and

iii. add A.III.1.b.i + A.III.1.b.ii and divide by 2000;

c. the rolling, 12- month summation of the monthly quantities of rubber cured and extruded, in tons; and,

d. the rolling, 12- month summation of the monthly VOC emission rates, in tons.

* This emission factor was established by the Rubber Manufacturers' Association (RMA). The permittee shall always use the most current emission factor that is established by the RMA.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month rubber production limitation of 25,000 tons and the rolling, 12-month VOC emission limitation of 20.8 tons (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined). Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

0.99 pound VOC/hour, 4.3 tons VOC/year

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

i. multiply the maximum hourly quantity of rubber cured, 1200 pounds/hour, by the emission factor of 0.000825 pound VOC/pound of rubber cured;

ii. multiply the maximum hourly quantity of rubber extruded, 1200 pounds/hour, by the emission factor of 0.00000352 pound VOC/pound of rubber extruded; and,

iii. sum A.V.1.a.i + A.V.1.a.ii of this permit.

If required, compliance with the hourly allowable VOC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual VOC emission limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

1.b Emission Limitation:

20.8 tons/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual emission limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

1.c Production Limitation:

25,000 tons rubber/rolling, 12-month period (for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054, combined)

Applicable Compliance Method:

Compliance with the annual production limitation above shall be determined by the record keeping required in condition A.III.1 of this permit.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13984, issued on June 19, 2003: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #5 for rubber curing and extrusion	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053 and P054 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units 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: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 1.36
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181.6
MAGLC (ug/m3): 738

Pollutant: acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136.8
MAGLC (ug/m3): 1,167

2. 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:

2.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;

III. Monitoring and/or Record Keeping Requirements (continued)

2.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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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:"

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

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

3.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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #2 Coating Cure Oven 1 (P055)

Activity Description: Cascade Line #2 Coating Cure Oven 1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
primer curing oven - Cascade line #2 and coating cure oven #1	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R009, P055, R030 and P056, combined See Section A.II.
	OAC rule 3745-21-07(G)(3)	3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
	OAC rule 3745-21-08(B)	See section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-13436.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e For purposes of federal enforceability, all OCs are considered to be VOCs.

2.f For purposes of calculating the combined OC emission rates for emissions units P055 and P056 and their associated spray booths (R009 and R030, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P055 and P056. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2.g The permittee has requested a federally enforceable emission limitation for emissions units R009, P055, R030 and P056, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.

2.h In accordance with OAC rule 3745-21-07(G)(3), emissions units P055 and P056, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R009 and R030) associated with these ovens (emissions units P055 and P056) are required to employ only non-photochemically reactive materials.

II. Operational Restrictions

1. The maximum annual coating usages for emissions units R009, P055, R030 and P056, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.

2. The maximum OC content of the primer coatings employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units P055 and P056, combined:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R009 (see section A.III of emissions unit R009) and in emissions unit R030 (see section A.III of emissions unit R030), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions units (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R009 and R030, combined (from section A.III.1.a. above);

c. the total number of hours each of emissions units P055 and P056 were in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).

2. The permittee shall collect and record the following information each month for emissions units R009, P055, R030 and P056, combined:

a. the company name and identification for each coating (i.e., primer coat or topcoat) and cleanup material employed;

b. the OC content of each coating and cleanup material employed, in pounds per gallon;

c. the number of gallons of each coating and cleanup material employed;

d. the OC emission rate for each coating and cleanup material employed [(b x c)/2000], in tons;

e. the total OC emissions rate for all the coatings and cleanup materials employed (summation of d for all coatings + summation of d for all cleanup materials), in tons;

f. the rolling, 12-month OC emission rate, in tons;

g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);

h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and

i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;

b. all exceedances of the hourly OC emission limitation of 3.0 pounds;

c. all exceedances of the daily OC emission limitation of 15.0 pounds;

d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and

e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

1.a Emission Limitations:

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R009, P055, R030, and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.

1.c Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
primer curing oven - Cascade line #2 and coating curing oven #1	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each 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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #2 Coating Cure Oven 2 (P056)

Activity Description: Cascade Line #2 Coating Cure Oven 2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
topcoat curing oven - Cascade line #2 and coating cure oven #2	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R009, P055, R030 and P056, combined See Section A.II.
	OAC rule 3745-21-07(G)(3)	3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
	OAC rule 3745-21-08(B)	See section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-13436.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e For purposes of federal enforceability, all OCs are considered to be VOCs.

2.f For purposes of calculating the combined OC emission rates for emissions units P055 and P056 and their associated spray booths (R009 and R030, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P055 and P056. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2.g The permittee has requested a federally enforceable emission limitation for emissions units R009, P055, R030 and P056, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.

2.h In accordance with OAC rule 3745-21-07(G)(3), emissions units P055 and P056, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R009 and R030) associated with these ovens (emissions units P055 and P056) are required to employ only non-photochemically reactive materials.

II. Operational Restrictions

1. The maximum annual coating usages for emissions units R009, P055, R030 and P056, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.

2. The maximum OC content of the primer coatings employed in emissions units R009 and P055 shall not exceed 6.35 pounds OC per gallon, as applied.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units P055 and P056, combined:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R009 (see section A.III of emissions unit R009) and in emissions unit R030 (see section A.III of emissions unit R030), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions units (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R009 and R030, combined (from section A.III.1.a. above);

c. the total number of hours each of emissions units P055 and P056 were in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).

2. The permittee shall collect and record the following information each month for emissions units R009, P055, R030 and P056, combined:

a. the company name and identification for each coating (i.e., primer coat or topcoat) and cleanup material employed;

b. the OC content of each coating and cleanup material employed, in pounds per gallon;

c. the number of gallons of each coating and cleanup material employed;

d. the OC emission rate for each coating and cleanup material employed [(b x c)/2000], in tons;

e. the total OC emissions rate for all the coatings and cleanup materials employed (summation of d for all coatings + summation of d for all cleanup materials), in tons;

f. the rolling, 12-month OC emission rate, in tons;

g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);

h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and

i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;

b. all exceedances of the hourly OC emission limitation of 3.0 pounds;

c. all exceedances of the daily OC emission limitation of 15.0 pounds;

d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and

e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

1.a Emission Limitations:

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P055 and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R009, P055, R030, and P056, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.

1.c Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
topcoat curing oven - Cascade line #2 and coating cure oven #2	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each 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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #3 Coating Cure Oven 1 (P057)

Activity Description: Cascade Line #3 Coating Cure Oven 1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
primer curing oven - Cascade line #3 and coating cure oven #1	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R007, P057, R031, and P058, combined See Section A.II.
	OAC rule 3745-21-07(G)(3)	3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
	OAC rule 3745-21-08(B)	See section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and 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 Permit to Install 03-13436.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e For purposes of federal enforceability, all OC is considered to be VOCs

2.f For purposes of calculating the combined OC emission rates for emissions units P057 and P058 and their associated spray booths (R007 and R031, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P057 and P058. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2.g The permittee has requested a federally enforceable emission limitation for emissions units R007, P057, R031, and P058, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.

2.h In accordance with OAC rule 3745-21-07(G)(3), emissions units P057 and P058, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R007 and R031) associated with these ovens (emissions units P057 and P058) are required to employ only non-photochemically reactive materials.

II. Operational Restrictions

1. The maximum annual coating usages for emissions units R007, P057, R031, and P058, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.

2. The maximum OC content of the primer coatings employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units P057 and P058, combined:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R007 (see section A.III of emissions unit R007) and in emissions unit R031 (see section A.III of emissions unit R031), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions unit (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R007 and R031, combined (from section A.III.1.a. above);

c. the total number of hours each of emissions units P057 and P058 were in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).

2. The permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, combined:

a. the company name and identification for each coating (i.e., primer coat or topcoat) employed;

b. the OC content of each coating employed, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the OC emission rate for each coating employed [(b x c)/2000], in tons;

e. the total OC emissions rate for all the coatings employed (summation of d for all coatings), in tons;

f. the rolling, 12-month OC emission rate, in tons;

g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);

h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and

i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;

b. all exceedances of the hourly OC emission limitation of 3.0 pounds;

c. all exceedances of the daily OC emission limitation of 15.0 pounds;

d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and

e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

1.a Emission Limitations:

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R007, P057, R031, and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.

1.c Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
primer curing oven - Cascade line #3 and coating cure oven #1	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each 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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #3 Coating Cure Oven 2 (P058)

Activity Description: Cascade Line #3 Coating Cure Oven 2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
topcoat curing oven - Cascade line #3 and coating cure oven #2	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-07(G)(3), 3745-21-08(B), 3745-23-06(B) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons organic compounds (OC)/year, for emissions units R007, P057, R031, and P058, combined See Section A.II.
	OAC rule 3745-21-07(G)(3)	3 pounds OC/hour not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined
	OAC rule 3745-17-11(B)	See section A.I.2.a.
	OAC rule 3745-17-07(A)	See section A.I.2.b.
	OAC rule 3745-23-06(B)	See section A.I.2.c.
	OAC rule 3745-21-08(B)	See section A.I.2.c.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and 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 Permit to Install 03-13436.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e For purposes of federal enforceability, all OC is considered to be VOCs

2.f For purposes of calculating the combined OC emission rates for emissions units P057 and P058 and their associated spray booths (R007 and R031, respectively), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booths that are emitted uncontrolled from the spray booths. The remaining 10 percent of the OCs employed in the spray booths shall be considered to be the uncontrolled emissions for emissions units P057 and P058. This "split" of OC emissions between these emissions units and their associated spray booths is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January, 1996. The "split" of OC emissions between the spray booths and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2.g The permittee has requested a federally enforceable emission limitation for emissions units R007, P057, R031, and P058, combined, of 6.5 tons OC per year based on the OC content and gallon usage restrictions for purposes of maintaining the PSD minor facility status.

2.h In accordance with OAC rule 3745-21-07(G)(3), emissions units P057 and P058, combined, shall comply with the emission limitation established in OAC rule 3745-21-07(G)(1). The spray booths (emissions units R007 and R031) associated with these ovens (emissions units P057 and P058) are required to employ only non-photochemically reactive materials.

II. Operational Restrictions

1. The maximum annual coating usages for emissions units R007, P057, R031, and P058, combined, shall not exceed 1,277 gallons of primer coating and 2,310 gallons of topcoat per rolling, 12-month summations of the monthly coating usage rates.

2. The maximum OC content of the primer coatings employed in emissions units R007 and P057 shall not exceed 6.35 pounds OC per gallon, as applied.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units P057 and P058, combined:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R007 (see section A.III of emissions unit R007) and in emissions unit R031 (see section A.III of emissions unit R031), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with these emissions unit (see section A.I.2.f above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions units R007 and R031, combined (from section A.III.1.a. above);

c. the total number of hours each of emissions units P057 and P058 were in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), where the higher number of hours from (c) is used, in pounds/hour (average).

2. The permittee shall collect and record the following information each month for emissions units R007, P057, R031, and P058, combined:

a. the company name and identification for each coating (i.e., primer coat or topcoat) employed;

b. the OC content of each coating employed, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the OC emission rate for each coating employed [(b x c)/2000], in tons;

e. the total OC emissions rate for all the coatings employed (summation of d for all coatings), in tons;

f. the rolling, 12-month OC emission rate, in tons;

g. the total number of gallons of all the primer coatings employed (summation of c for all primer coatings);

h. the total number of gallons of all the topcoats employed (summation of c for all topcoats); and

i. the rolling, 12-month usage rates for all the primer coatings and for all the topcoats employed.

Note: the coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month gallon usage restrictions for the primer coatings and topcoat coatings of 1,277 gallons and 2,310 gallons, respectively;

b. all exceedances of the hourly OC emission limitation of 3.0 pounds;

c. all exceedances of the daily OC emission limitation of 15.0 pounds;

d. all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons; and

e. all exceedances of the OC content restriction of 6.35 pounds OC/gallon primer coating, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

1.a Emission Limitations:

3 pounds OC/hr not to exceed 15 pounds OC/day, for emissions units P057 and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation:

6.5 tons OC/rolling, 12-month period, for emissions units R007, P057, R031, and P058, combined

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in section A.III.2 of this permit.

1.c Emission Limitation:

6.5 lbs OC/gallon of primer coating

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
topcoat curing oven - Cascade line #3 and coating cure oven #2	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because each 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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#4 Coating Cure Oven (P067)

Activity Description: Dual Durometer Line #4 Coating Cure Oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #4 curing oven	OAC rule 3745-31-05(A)(3) PTI No. 03-13097	2.73 tons organic compounds/year (for this emissions unit) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-23-06(B), 3745-21-07(G)(3) and 3745-18-06(E).
	OAC rule 3745-31-05(D) PTI No. 03-13097	4.52 tons OC/rolling, 12-month summation of the monthly OC emission rates, for emissions units R003 and P067, combined
	OAC rule 3745-21-07(G)(3)	3.0 pounds OC/hour not to exceed 15.0 pounds OC/day (for this emissions unit)
	OAC rule 3745-21-08(B)	See Section A.I.2.c.
	OAC rule 3745-23-06(B)	See Section A.I.2.c.
	OAC rule 3745-17-11(B)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
	OAC rule 3745-18-06(E)	Exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.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 the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and 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 Permit to Install 03-13097.

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.

2.d The emissions unit has a rated capacity of less than one thousand pounds per hour process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

2.e For purposes of calculating the combined OC emission rates for this emissions unit and its associated spray booth (R003), the permittee shall utilize a value of 90 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 10 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon the results of total hydrocarbon (THC) emission testing at the facility performed in January 1996. The "split" of OC emissions between the spray booth and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2.f For purposes of federal enforceability, all OCs are considered to be VOCs.

The monitoring, record keeping and reporting requirements to ensure compliance with the annual allowable of 4.52 tons OC/rolling, 12-month period are established in Sections A.III.1 and 2 of the permit for emissions unit R003. Therefore, no additional monitoring, record keeping and reporting requirements are necessary to ensure compliance with this emission limitation.

2.g The permittee has requested a federally enforceable emission limitation for emissions units R003 and P067, combined, of 4.52 tons OC per year, based on the OC content and gallon usage restrictions for purposes of maintaining their PSD minor facility status (see A.II.1 - A.II.3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R003 (see section A.III.1.f of emissions unit R003), in pounds;

b. the total OC emission rate, in pounds, calculated by multiplying the maximum percentage of the emissions associated with this emissions unit (see section A.I.2.e above) by the total (prior to applying the booth/oven "split") OC emission rate for all the coatings employed in emissions unit R003 (from section A.III.1.a. above);

c. the total number of hours the emissions unit was in operation; and

d. the average hourly OC emission rate (after the booth/oven "split") (b/c), in pounds/hour (average).

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.III.1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the hourly OC emission limitation of 3.0 pounds; and

b. all exceedances of the daily OC emission limitation of 15.0 pounds.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:
3.0 pounds OC/hour and 15.0 pounds OC/day
2.73 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations based on the record keeping requirements established in section A.III.1 of this permit.

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

Compliance with the annual allowable OC emission limitation shall be assumed as long as compliance with the daily allowable OC emission limitation is maintained (the annual allowable OC emission limitation was determined by multiplying the daily allowable OC emission limitation by 365, and then dividing by 2000).

1.b Emission Limitation:

4.52 tons OC/rolling, 12-month period (for emissions units R003 and P067, combined)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation based on the record keeping requirements established in sections A.III.1and 2 of the permit for emissions unit R003.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#3 Coating/Printing Operations (R002)

Activity Description: Dual Durometer Line #3 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #3 paint booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	87.12 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	5.52 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

2.b For purposes of calculating the organic compound emission rates for this emissions unit (R002) and the associated oven (emissions unit P008), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

II. Operational Restrictions (continued)

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. . the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 87.12 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 5.52 tons.

Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

87.12 pounds OC/day
5.52 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#4 Coating/Printing Operations (R003)

Activity Description: Dual Durometer Line #4 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #4 paint booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13097	1.51 pounds organic compounds (OC)/hour, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-13097	4.52 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R003 and P067, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the organic compound emission rates for this emissions unit (R003) and the associated oven (emissions unit P067), the permittee shall utilize a value of 90 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 10 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The hourly OC emission limitation of 1.51 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds; and

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.c.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit).

2. The permittee shall calculate and record the following information each month for emissions units R003 and P067, combined:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

h. the total OC emissions for all the coatings and cleanup materials employed (f + g), in pounds; and

i. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 4.52 tons (for emissions units R003 and P067, combined). Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

1.51 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon of coating) by the maximum hourly coating usage rate (gallon/hour) and then by 0.9.*

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

* The booth/oven split was determined to be 90/10, based on the results of emission testing conducted in September of 1989.

1.b Emission Limitation:

4.52 tons OC/year, based on a rolling, 12-month summation (for emissions units R003 and P067, combined) from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual OC emission limitation through the record keeping required in sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000).

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13097, issued on February 18, 1999: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-OLSB Coating/Printing Operations (R004)

Activity Description: Off Line Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
offline spray booth	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	on days when no photochemically reactive materials are employed: 91.68 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	1.52 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, from the use of coating and cleanup materials
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2)	on days when any photochemically reactive materials are employed: 8 pounds organic compounds (OC)/hour, 40 pounds OC/day

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification for each coating and cleanup material employed;

b. a determination of whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and cleanup material employed;

d. the OC content of each coating and cleanup material employed, in pounds per gallon;

e. on the days when only no photochemically reactive materials are employed, the OC emission rate for each coating and cleanup material employed (c x d), in pounds;

f. on the days when only no photochemically materials are employed, the total OC emission rate for all the coatings and cleanup materials employed (the summation of "e" for all coatings + the summation of "e" for all cleanup materials), in pounds;

g. on the days when any photochemically reactive material is employed, the OC emission rate for each coating and photochemically reactive cleanup material (c x d), in pounds;

h. on the days when any photochemically reactive material is employed, the OC emission rate for all the coatings and photochemically reactive cleanup materials [summation of "g" for all coatings + summation of "g" for all photochemically reactive cleanup materials], in pounds;

i. on the days when any photochemically reactive material is employed, the number of hours the emissions unit was in operation;

j. on the days when any photochemically reactive material is employed, the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials (h/i), in pounds (average); and

k. the total OC emissions for all the coating and cleanup materials employed [summation of (c x d) for all coatings + summation of (c x d) for all cleanup materials].

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

3. The permittee shall collect and record the following information each month for this emissions unit:

a. the total OC emission rate, in pounds, calculated by summing the daily OC emission rates (from section A.III.1.k) for the calendar month, in pounds; and

b. the rolling, 12-month OC emission rate, in tons.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when only no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 91.68 pounds;

b. on the days when any photochemically reactive material was employed, all exceedances of the hourly and/or daily OC emission limitations of 8.0 pounds and 40 pounds, respectively; and

c. all exceedances of the rolling, 12-month OC emission limitation of 1.52 tons.

Each report shall be submitted within 30 days after the deviation occurs.

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1. and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

8 pounds OC/hour, not to exceed 40 pounds OC/day, on days when any photochemically reactive material is employed

91.68 pounds OC/day, on days when no photochemically reactive materials are employed

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable OC emission limitations above through the record keeping required in section A.III.1 of this permit.

1.b Emission Limitation:

1.52 tons OC/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the OC emission limitation above through the record keeping required in section A.III.3 of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#1 Coating/Printing Operations (R005)

Activity Description: Dual Durometer Line #1 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #1 spray booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	35.76 pounds organic compounds (OC)/day See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	4.46 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A) and 3745-21-07(G).

2.b For purposes of calculating the organic compound emission rates for this emissions unit (R005) and the associated oven (emissions unit P010), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. . the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 35.76 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 4.46 tons.

Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

35.76 pounds OC/day, 4.46 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in Sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#2 Coating/Printing Operations (R006)

Activity Description: Dual Durometer Line #2 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #2 spray booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	87.12 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	8.19 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).

2.b For purposes of calculating the organic compound emission rates for this emissions unit (R006) and the associated oven (emissions unit P011), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

II. Operational Restrictions (continued)

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. . the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 87.12 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 8.19 tons.

Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

87.12 pounds OC/day
8.19 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC#3 Coating/Printing Operations (R007)

Activity Description: Cascade Line #3 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
primer spray booth - Cascade line #3 spray booth #1, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	3.43 pounds organic compounds (OC)/hour, from the use of coatings
		0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year
		See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R007, P057, R031 and P058, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the organic compound emission rates for this emissions unit (R007) and the associated oven (emissions unit P057), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The hourly OC emission limitation of 3.43 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds; and

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.

2. The permittee shall calculate and record the following information each month for emissions units R007, P057, R031 and P058, combined:

a. the company identification for each coating and cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each coating and cleanup material employed, in gallons;

d. the OC content of each coating and cleanup material employed, in pounds/gallon;

e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and

g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R007, P057,R031 and P058, combined). Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

3.43 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon of coating) by the maximum hourly coating usage rate (gallon/hour) and then by 0.95.*

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

The booth/oven split was determined to be 95/5, based on the results of emission testing conducted in September of 1989.

1.b Emission Limitation:

6.5 tons OC/year, based on a rolling, 12-month summation (for emissions units R007, P057, R031, and P058, combined) from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual OC emission limitation through the record keeping required in sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000).

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#1 Coating/Printing Operations (R008)

Activity Description: Flock Line #1 Adhesive Booth, Flocking Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #1 adhesive booth	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when no photochemically reactive materials are employed, the organic compound (OC) emissions (for emissions units R008 and P014, combined) shall not exceed 86.64 pounds/day, from the use of coatings. 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year (from the flocking booth) On the days when any photochemically reactive material is employed, see Section A.I.2.a. See section A.I.2.b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-17-07(A).
	OAC rule 3745-31-05(D) PTI No. 03-11229	The total OC emissions (for emissions units R008 and P014, combined) shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-17-11(B)	See Section A.I.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

2.a On the days when any photochemically reactive material is employed, the VOC content of each adhesive coating employed in emissions units R008 and P014 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]

2.b In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R008 and P014, combined:

a. the company identification for each coating material employed;

b. a determination of whether or not each coating material employed is a photochemically reactive material;

c. on the days when no photochemically reactive materials are employed, the number of gallons of each coating employed;

d. on the days when no photochemically reactive materials are employed, the OC content of each coating employed, in pounds per gallon;

e. on the days when no photochemically reactive materials are employed, the OC emission rate for each coating employed (c x d), in pounds;

f. on the days when no photochemically reactive materials are employed, the total OC emission rate for all the coatings employed (the summation of "e" for coatings), in pounds; and

g. on the days when any photochemically reactive coating is employed, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R008 and P014, combined:

a. the company identification for each liquid organic material employed;

b. the number of gallons of each liquid organic material employed;

c. the OC content of each liquid organic material employed, in pounds/gallon;

d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and

e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R008 and P014, combined);

b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R008 and P014, combined); and

c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

1.c VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

V. Testing Requirements (continued)

1.d Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year - from flocking booth

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2000).

1.e Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #1 adhesive booth	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R008 and P014 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

2. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC#2 Coating/Printing Operations (R009)

Activity Description: Cascade Line #2 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Cascade line #2 spray booth #1, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	3.43 pounds organic compounds (OC)/hour, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R009, P055, R030, and P056, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the OC emission rates for emissions units R009 and R030 and the associated ovens P055 and P056, the permittee shall utilize a value of 90 percent as the percentage of the OC employed in R009 and R030 that are emitted uncontrolled from R009 and R030. The remaining 10 percent of the OC employed in R009 and R030 shall be considered to be the uncontrolled emissions for P055 and P056. This "split" of OC emissions between the spray booths and the ovens is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

2. Additional Terms and Conditions (continued)

2.d The hourly OC emission limitation of 3.43 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds; and

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.

2. The permittee shall calculate and record the following information each month for emissions units R009, P055, R030 and P056, combined:

a. the company identification for each coating and cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each coating and cleanup material employed, in gallons;

d. the OC content of each coating and cleanup material employed, in pounds/gallon;

e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and

g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R009, P055, R030 and P056, combined). Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

3.43 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon of coating) by the maximum hourly coating usage rate (gallon/hour) and then by 0.95.*

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

* The booth/oven split was determined to be 95/5, based on the results of emission testing conducted in September of 1989.

1.b Emission Limitation:

6.5 tons OC/year, based on a rolling, 12-month summation (for emissions units R009, P055, R030, and P056, combined) from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with annual OC emission limitation through the record keeping required in sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000).

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13436, issued on March 1, 2001: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#2 Coating/Printing Operations (R011)

Activity Description: Flock Line #2 Adhesive Booth, Flocking Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #2 adhesive booth	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when no photochemically reactive materials are employed, the organic compound (OC) emissions (for emissions units R011 and P018, combined) shall not exceed 86.64 pounds/day, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year (from the flocking booth) On the days when any photochemically reactive material is employed, see Section A.I.2.a. See section A.I.2.b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-17-07(A).
	OAC rule 3745-31-05(D) PTI No. 03-11229	The total OC emissions (for emissions units R011 and P018, combined) shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-17-11(B)	See Section A.I.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

2.a On the days when any photochemically reactive material is employed, the VOC content of each adhesive coating employed in emissions units R011 and P018 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]

2.b In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R011 and P018, combined:

a. the company identification for each coating material employed;

b. a determination of whether or not each coating material employed is a photochemically reactive material;

c. on the days when no photochemically reactive materials are employed, the number of gallons of each coating employed;

d. on the days when no photochemically reactive materials are employed, the OC content of each coating employed, in pounds per gallon;

e. on the days when no photochemically reactive materials are employed, the OC emission rate for each coating employed (c x d), in pounds;

f. on the days when no photochemically reactive materials are employed, the total OC emission rate for all the coatings employed (the summation of "e" for coatings), in pounds; and

g. on the days when any photochemically reactive coating is employed, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R011 and P018, combined:

a. the company identification for each liquid organic material employed;

b. the number of gallons of each liquid organic material employed;

c. the OC content of each liquid organic material employed, in pounds/gallon;

d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and

e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R011 and P018, combined);

b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R011 and P018, combined); and

c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

1.c VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

V. Testing Requirements (continued)

1.d Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year - from flocking booth

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2000).

1.e Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #2 adhesive booth	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R011 and P018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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 (note: screening scenario identical to that for P014 and R008) 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defin

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#3 Coating/Printing Operations (R012)

Activity Description: Flock Line #3 Adhesive Booth, Flocking Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #3 adhesive booth	OAC rule 3745-31-05(A)(3) PTI No. 03-11229	On the days when no photochemically reactive materials are employed, the organic compound (OC) emissions (for emissions units R012 and P021, combined) shall not exceed 86.64 pounds/day, from the use of coatings 0.1 pound particulate emissions (PE)/hour, 0.44 ton PE/year (from the flocking booth) On the days when any photochemically reactive material is employed, see Section A.I.2.a. See section A.I.2.b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-17-07(A).
	OAC rule 3745-31-05(D) PTI No. 03-11229	The total OC emissions (for emissions units R012 and P021, combined) shall not exceed 8.32 tons OC/year, based upon a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.b.]
	OAC rule 3745-17-11(B)	See Section A.I.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

2.a On the days when any photochemically reactive material is employed, the VOC content of each adhesive coating employed in emissions units R012 and P021 shall not exceed 3.60 pounds VOC/gallon of coating on an "as applied" basis. [Pursuant to the study discussed in Part II, section A.1, once an adhesive coating with a VOC content of less than 3.60 pounds VOC/gallon has been approved for use in production, the permittee shall begin using such coating.]

2.b In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R012 and P021, combined:

a. the company identification for each coating material employed;

b. a determination of whether or not each coating material employed is a photochemically reactive material;

c. on the days when no photochemically reactive materials are employed, the number of gallons of each coating employed;

d. on the days when no photochemically reactive materials are employed, the OC content of each coating employed, in pounds per gallon;

e. on the days when no photochemically reactive materials are employed, the OC emission rate for each coating employed (c x d), in pounds;

f. on the days when no photochemically reactive materials are employed, the total OC emission rate for all the coatings employed (the summation of "e" for coatings), in pounds; and

g. on the days when any photochemically reactive coating is employed, the VOC content of each coating, in pounds per gallon, as applied.

Note: The coating information must be for the coating as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information each month for emissions units R012 and P021, combined:

a. the company identification for each liquid organic material employed;

b. the number of gallons of each liquid organic material employed;

c. the OC content of each liquid organic material employed, in pounds/gallon;

d. the total OC emission rate for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials], in pounds; and

e. the rolling, 12-month OC emission rate for all the liquid organic materials employed, in tons.

III. Monitoring and/or Record Keeping Requirements (continued)

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for the following:

a. on the days when no photochemically reactive materials were employed, all exceedances of the daily OC emission limitation of 86.64 pounds (for emissions units R012 and P021, combined);

b. all exceedances of the rolling, 12-month OC emission limitation of 8.32 tons (for emissions units R012 and P021, combined); and

c. on the days when any photochemically reactive material was employed, all exceedances of the VOC content limitation of 3.60 pounds VOC/gallon, as applied.

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

86.64 pounds OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

1.b Emission Limitation:

8.32 tons OC/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements established in Sections A.III.1 and 2 of this permit.

1.c VOC Content Limitation:

3.6 lbs VOC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.1 of this permit.

V. Testing Requirements (continued)

1.d Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year - from flocking booth

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation (the annual PE limitation was developed by multiplying the hourly PE limitation by 8,760, and then dividing by 2000).

1.e Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

2. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-11229, issued on May 3, 2000: A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #3 adhesive booth	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R012 and P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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 (note: screening scenario identical to that for P014 and R008) 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 1.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 350
MAGLC (ug/m3): 13,904

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification defin

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#6 Coating/Printing Operations (R013)

Activity Description: Dual Durometer Line #6 Spray Booth #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #6 spray booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	87.12 pounds organic compounds (OC)/day, from the use of coatings and cleanup materials See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	4.49 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).

2.b For purposes of calculating the organic compound emission rates for this emissions unit (R013) and the associated oven (emissions unit P024), the permittee shall utilize a value of 95 percent as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 5 percent of the organic compounds employed in the oven shall be considered to be the uncontrolled emissions for the oven. This "split" of OC emissions between this emissions unit and the oven is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

II. Operational Restrictions (continued)

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.III.1 through A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 87.12 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 4.49 tons.

Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-9391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

87.12 pounds OC/day
4.49 tons OC/rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitations through the record keeping required in sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-9391, issued on March 27, 1996: A.V.1 and 2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#7 Coating/Printing Operations (R014)

Activity Description: Dual Durometer Line #7 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #7: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	OAC rule 3745-31-05(A)(3) PTI No. 03-13675	2.55 pounds organic compounds (OC)/hour, 11.17 tons OC/year, from this emissions unit 0.04 pound particulate emissions (PE)/hour, 0.18 ton PE/year, from this emissions unit See Section A.I.2.b.
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2)	None (See Section A.II.1.)
	OAC rule 3745-21-07(G)(1)	See Section A.I.2.d.

2. Additional Terms and Conditions

2.a The 2.55 pounds OC/hour and 11.17 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

2.b The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G)(2).

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

2.d The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation of 2.55 pounds OC/hour, from the entire line, is a summation of the individual potential to emit OC emission limitations from each component of the line. The two curing ovens contribute 0.023 pound OC/hour and 0.19 pound OC/hour, which are more stringent than the 3 pounds OC/hour and 15 pounds OC/day established by OAC rule 3745-21-07(G)(1).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the company identification for each coating (i.e., ink, mastic or coating) and cleanup material employed; and

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.IV.1 and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

2.55 pounds OC/hour

Applicable Compliance Method:

*The hourly allowable OC emission limitastion was established for this emissions unit (the entire dual durometer line) based on the addition of the potentials to emit for OC from each individual component of the line. Emissions unit R014 consists of eight individual components:

i. Booth #1 - (B1);
ii. Curing Oven #1 - (CO1);
iii. Booth #2 - (B2);
iv. Booth #3 - (B3);
v. Curing Oven #2 - (CO2);
vi. Plastic Extrusion - (PE);
vii. Ink Application - (IA); and
x. Mastic Application - (MA).

The potential to emit for emissions unit R014 was calculated as follows:

PTE = B1 + CO1 + B2 + B3 + CO2 + PE + IA + MA

where:

PTE = Potential to Emit for Dual Durometer Line (emissions unit R014), in pounds OC/hour

B1 = OC emissions from Booth #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.90)* = 0.21 pound OC/hour

CO1= OC emissions from Curing Oven #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.10)* = 0.02 pound OC/hour

B2 = OC emissions from Booth #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 0.10 pound OC/gallon) = 0.10 pound OC/hour

B3 = OC emissions from Booth #3, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.90)* = 1.71 pounds OC/hour

CO2 = OC emissions from Curing Oven #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.10)* = 0.19 pound OC/hour

PE = OC emissions from Plastic Extrusion, in pounds OC/hour = (maximum plastic extrusion rate of 150 pounds/hour) x (0.002 pound OC/pound plastic extruded)** = 0.30 pound/hour

IA = OC emissions from Ink Application, in pounds/hour = (maximum ink usage rate of 0.001 gallon/hour) x (maximum OC content of 6.8 pounds OC/gallon) = 0.007 pound OC/hour

MA = OC emissions from Mastic Application, in pounds/hour = (maximum mastic usage rate of 0.64 gallon/hour) x (maximum OC content of 0.0153 pound OC/gallon) = 0.01 pound OC/hour

PTE = 0.21 + 0.02 + 0.10 + 1.71 + 0.19 + 0.30 + 0.007 + 0.01 = 2.55 pounds OC/hour

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

V. Testing Requirements (continued)

*For purposes of determining the OC emission rates between coating operations and the associated oven, the permittee shall utilize a value of 90% as the maximum percentage of the organic compounds employed in the coating operations that are emitted uncontrolled. The remaining 10% of the organic compounds employed shall be considered to be the uncontrolled emissions for the associated oven.
.
**Based on Rubber Manufacturers Association Emission Factors Development Project, Sept. 1996.

1.b Emission Limitation:

11.17 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760 a, and then dividing by 8760).

1.c Emission Limitation:

0.04 pound PE/hour

Applicable Compliance Method:

Compliance with the hourly PE limitation may be determined by utilizing the following equation:

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

Where:

E = PE rate, in pounds/hour

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

CE = control efficiency of the control equipment

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

1.d Emission Limitation:

0.18 ton PE/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 8760).

1.e Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #7: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#8 Coating/Printing Operations (R015)

Activity Description: Dual Durometer Line #8 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #8: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	OAC rule 3745-31-05(A)(3) PTI No. 03-13675	2.55 pounds organic compounds (OC)/hour, 11.17 tons OC/year, from this emissions unit 0.04 pound particulate emissions (PE)/hour, 0.18 ton PE/year, from this emissions unit See Section A.I.2.b.
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2)	None (See Section A.II.1.)
	OAC rule 3745-21-07(G)(1)	See Section A.I.2.d.

2. Additional Terms and Conditions

2.a The 2.55 pounds OC/hour and 11.17 tons OC/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

2.b The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G)(2).

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

2.d The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation of 2.55 pounds OC/hour, from the entire line, is a summation of the individual potential to emit OC emission limitations from each component of the line. The two curing ovens contribute 0.023 pound OC/hour and 0.19 pound OC/hour, which are more stringent than the 3 pounds OC/hour and 15 pounds OC/day established by OAC rule 3745-21-07(G)(1).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the company identification for each coating (i.e., ink, mastic or coating) and cleanup material employed; and

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.III.1 and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

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

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.IV.1 and A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

2.55 pounds OC/hour

Applicable Compliance Method:

*The hourly allowable OC emission limitastion was established for this emissions unit (the entire dual durometer line) based on the addition of the potentials to emit for OC from each individual component of the line. Emissions unit R015 consists of eight individual components:

i. Booth #1 - (B1);
ii. Curing Oven #1 - (CO1);
iii. Booth #2 - (B2);
iv. Booth #3 - (B3);
v. Curing Oven #2 - (CO2);
vi. Plastic Extrusion - (PE);
vii. Ink Application - (IA); and
x. Mastic Application - (MA).

The potential to emit for emissions unit R015 was calculated as follows:

PTE = B1 + CO1 + B2 + B3 + CO2 + PE + IA + MA

where:

PTE = Potential to Emit for Dual Durometer Line (emissions unit R015), in pounds OC/hour

B1 = OC emissions from Booth #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.90)* = 0.21 pound OC/hour

CO1= OC emissions from Curing Oven #1, in pounds OC/hour = (maximum coating usage rate of 0.7 gallon/hour) x (maximum OC content of 0.33 pound OC/gallon) x (0.10)* = 0.02 pound OC/hour

B2 = OC emissions from Booth #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 0.10 pound OC/gallon) = 0.10 pound OC/hour

B3 = OC emissions from Booth #3, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.90)* = 1.71 pounds OC/hour

CO2 = OC emissions from Curing Oven #2, in pounds OC/hour = (maximum coating usage rate of 1.0 gallon/hour) x (maximum OC content of 1.9 pounds OC/gallon) x (0.10)* = 0.19 pound OC/hour

PE = OC emissions from Plastic Extrusion, in pounds OC/hour = (maximum plastic extrusion rate of 150 pounds/hour) x (0.002 pound OC/pound plastic extruded)** = 0.30 pound/hour

IA = OC emissions from Ink Application, in pounds/hour = (maximum ink usage rate of 0.001 gallon/hour) x (maximum OC content of 6.8 pounds OC/gallon) = 0.007 pound OC/hour

MA = OC emissions from Mastic Application, in pounds/hour = (maximum mastic usage rate of 0.64 gallon/hour) x (maximum OC content of 0.0153 pound OC/gallon) = 0.01 pound OC/hour

PTE = 0.21 + 0.02 + 0.10 + 1.71 + 0.19 + 0.30 + 0.007 + 0.01 = 2.55 pounds OC/hour

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

V. Testing Requirements (continued)

*For purposes of determining the OC emission rates between coating operations and the associated oven, the permittee shall utilize a value of 90% as the maximum percentage of the organic compounds employed in the coating operations that are emitted uncontrolled. The remaining 10% of the organic compounds employed shall be considered to be the uncontrolled emissions for the associated oven.

**Based on Rubber Manufacturers Association Emission Factors Development Project, Sept. 1996.

1.b Emission Limitation:

11.17 tons OC/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760 a, and then dividing by 8760).

1.c Emission Limitation:

0.04 pound PE/hour

Applicable Compliance Method:

Compliance with the hourly PE limitation may be determined by utilizing the following equation:

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

Where:

E = PE rate, in pounds/hour

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

CE = control efficiency of the control equipment

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

1.d Emission Limitation:

0.18 ton PE/year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 8760).

1.e Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-13675, issued on February 28, 2002: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #8: spray booths #1, #2 and #3, with dry filtration; curing ovens #1 and #2; plastic extruders #1 and #2; ink application, and mastic application	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#6 Coating/Printing Operations 2 (R016)

Activity Description: Dual Durometer Line #6 Spray Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer line #6 spray booth #2	OAC rule 3745-31-05(A)(3) PTI No. 03-8375	27.52 pounds organic compounds (OC)/day, from the use of coatings See Sections A.II.2 and A.II.3. See Section A.I.2.a.
	OAC rule 3745-21-07(G)	See Section A.II.1.
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

II. Operational Restrictions

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

2. The permittee shall only employ water-based coating materials in this emissions unit with a maximum OC content of 0.94 pound/gallon.

3. The permittee shall not employ any cleanup material in this emissions unit that will result in OC emissions.

4. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for this emissions unit:

a. the company identification of each coating and cleanup material employed;

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

c. documentation on whether or not each cleanup material employed resulted in OC emissions.

2. The permittee shall maintain the following information each day for this emissions unit:

a. the quantity of each coating employed, in gallons;

b. the OC content of each coating employed, in pounds/gallon;

c. the OC emissions for each coating employed, in pounds; and

d. the total OC emissions for all the coatings employed, in pounds (summation of "c" for all coatings).

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-8375, issued on June 21, 1995: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying materials (i.e., photochemically reactive coatings and/or cleanup materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 27.52 pounds and of the OC content limitation of 0.94 pound OC/gallon. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

4. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing the use of noncomplying cleanup materials (i.e., cleanup materials that resulted in the emissions of OCs) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days of the date of the daily record indicating noncompliance.

5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-8375, issued on June 21, 1995: A.IV.1, A.IV.2, A.IV.3 and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

27.52 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily OC emission limiation through the record keeping required in Section A.III.2 of this permit.

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

1.d OC Content Limitation:

0.94 lb OC/gallon of coating

Applicable Compliance Method:

Compliance with allowable VOC content limitation shall be determined by the record keeping requirements established in Section A.III.2 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-8375, issued on June 21, 1995: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#6 Coating/Printing Operations 3 (R017)

Activity Description: Dual Durometer Line #6 Spray Booth #3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #6 spray booth #3, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	51.36 pounds organic compounds (OC)/day See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	1.55 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).

2.b For purposes of calculating the OC emission rates for emissions unit R017 and the associated oven P025, the permittee shall utilize a value of 95 percent as the percentage of the OC employed in R017 that are emitted uncontrolled from R017. The remaining 5 percent of the OC employed in R017 shall be considered to be the uncontrolled emissions for P025. This "split" of OC emissions between R017 and P025 is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 51.36 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 1.55 tons.

Each report shall be submitted within 30 days after the deviation occurs.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

51.36 pounds OC/day, 1.55 tons OC/year, based on a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#5 Coating/Printing Operations (R020)

Activity Description: Dual Durometer Line #5 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #5 spray booth, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9391	35.7 pounds organic compounds (OC)/day See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9391	4.26 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-17-11(B)(1)	0.551 pound particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G)(2).

2.b For purposes of calculating the OC emission rates for emissions unit R020 and the associated ovens P015, the permittee shall utilize a value of 95 percent as the percentage of the OC employed in R020 that are emitted uncontrolled from R020. The remaining 5 percent of the OC employed in R020 shall be considered to be the uncontrolled emissions for P015. This "split" of OC emissions between R020 and P015 is based upon the results of emission testing performed by the permittee in September 1989. The "split" of OC emissions between this emissions unit and the associated oven shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.III.1, A.III.2, and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 35.7 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 4.26 tons.

Each report shall be submitted within 30 days after the deviation occurs.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09391, issued on March 27, 1996 (modification): A.IV.1., A.IV.2, and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

35.7 pounds OC/day, 4.26 tons OC/year, based on a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily and annual OC emission limitation through the record keeping required in Sections A.III.1 and 2 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:

0.551 pound PE/hour

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.c Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09391, issued on March 27, 1996: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-DD#9 Coating/Printing Operations (R024)

Activity Description: Dual Durometer Line #9 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
dual durometer extrusion line #9 spray booth #2, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-9822	31.2 pounds organic compounds (OC)/day 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9822	3.72 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the OC emission rates for emissions units R024 and the associated oven P037, the permittee shall utilize a value of 85 percent as the percentage of the OC employed in R024 that are emitted uncontrolled from R024. The remaining 15 percent of the OC employed in R024 shall be considered to be the uncontrolled emissions for P037. This "split" of OC emissions between R024 and P037 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

II. Operational Restrictions (continued)

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09822, issued on May 21, 1997: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 31.2 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 3.72 tons.

Each report shall be submitted within 30 days after the deviation occurs.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09822, issued on May 21, 1997: A.IV.1, A.IV2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

31.2 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily OC emission limitation through the record keeping required in Section A.III.1 of this permit.

1.b Emission Limitation:

3.72 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09822, issued on May 21, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC#1 Coating/Printing Operations (R026)

Activity Description: Cascade Line #1 Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Cascade line #1 spray booth #1	OAC rule 3745-31-05(A)(3) PTI No. 03-9900	77.7 pounds organic compounds (OC)/day 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-9900	2.85 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the OC emission rates for emissions units R026 and the associated oven P039, the permittee shall utilize a value of 85 percent as the percentage of the OC employed in R026 that are emitted uncontrolled from R026. The remaining 15 percent of the OC employed in R026 shall be considered to be the uncontrolled emissions for P039. This "split" of OC emissions between R026 and P039 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

II. Operational Restrictions (continued)

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds;

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds;

g. the total OC emissions for all the coatings after applying the booth/oven "split" (as defined in Section A.I.2.b.), in pounds ("f" multiplied by the maximum percentage of the emissions associated with this emissions unit); and

h. the OC emissions for all the coatings and cleanup materials employed (A.III.1.g + A.III.2.h), in pounds.

2. The permittee shall calculate and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each cleanup material employed, in gallons;

d. the OC content of each cleanup material employed, in pounds/gallon;

e. the OC emissions for each cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the cleanup materials employed (summation of "e" for all cleanup materials), in pounds;

g. the number of days the emissions unit was in operation;

h. the average daily OC emissions for all the cleanup materials employed (i.e., f/g), in pounds (average);

i. the total OC emissions for all the coatings employed (summation of the daily OC emission rates, from section A.III.1.g above, for the calendar month), in pounds;

j. the total OC emissions for all the coatings and cleanup materials employed (f + i), in pounds; and

k. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

III. Monitoring and/or Record Keeping Requirements (continued)

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-09900, issued on May 21, 1997: A.III.1, A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the daily OC emission limitation of 77.7 pounds; and

b. all exceedances of the rolling, 12-month OC emission limitation of 2.85 tons.

Each report shall be submitted within 30 days after the deviation occurs.

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

4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-09900, issued on May 21, 1997: A.IV.1, A.IV.2 and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitations:

77.7 pounds OC/day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily OC emission limitation through the record keeping required in Section A.III.1 of this permit.

1.b Emission Limitation:

2.85 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-09900, issued on May 21, 1997: A.V.1. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-FL#4 Coating/Printing Operations (R029)

Activity Description: Flock Line #4 Adhesive Booth, Flocking Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #4 - adhesive booth, drying conveyor and flocking booth	OAC rule 3745-31-05(A)(3) PTI No. 03-10454	from adhesive application: 77.1 pounds organic compounds (OC)/day, excluding cleanup material, for emissions units R029 and P044, combined 169 pounds OC/month, from cleanup material usage, for this emissions unit from flocking booth: 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year, for this emissions unit See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-10454	7.3 tons OC/rolling, 12-month period, from adhesive usage for emissions units R029 and P044, combined 0.85 ton OC/rolling, 12-month period, from cleanup material usage for this emissions unit
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)(2)	exempt, pursuant to OAC rule 3745-21-07(G)(9)(g) [See A.I.2.c.]

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirement of OAC rules 3745-17-07(A) and 3745-21-07(G).

2. Additional Terms and Conditions (continued)

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

2.c In accordance with OAC rule 3745-21-07(G)(9)(g), best available technology (BAT) for this emissions unit, as established pursuant to OAC rule 3745-31-05, has been determined to be more stringent than, or inconsistent with, the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for emissions units R029 and P044, combined:

a. the company identification for each coating (adhesive) employed;

b. the quantity of each coating (adhesive) employed, in gallons;

c. the OC content of each coating (adhesive) employed, in pounds/gallon;

d. the OC emissions for each coating (adhesive) employed, in pounds (b x c);

e. the total OC emissions for all the coatings (adhesives) employed, in pounds (summation of "d" for all coatings);

f. the number of days the emissions unit was in operation (when coatings (adhesives) were being applied);

g. the average daily OC emission rate, in pounds (e/f); and

h. the total OC emissions per rolling, 12-month period, in tons.

Note: the coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain the following information each month for cleanup materials employed in emissions units R029 and P044, combined:

a. the company identification for each cleanup material employed;

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

c. the OC content of each cleanup material employed, in pounds/gallon;

d. the OC emissions for each cleanup material employed, in pounds (b x c);

e. the total OC emissions for all the cleanup materials employed, in pounds (summation of "d" for all cleanup materials); and

f. the total amount of OC emissions per rolling, 12-month period, in tons.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-10454, issued on September 10, 1998 (revised July 20, 2004): A.III.1, and A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

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

a. the daily OC emission limitation of 77.1 pounds (excluding cleanup material);

b. the monthly OC emission limitation of 169 pounds (from cleanup material usage);

c. the rolling, 12-month OC emission limitation of 7.3 tons; and

d. the rolling, 12-month OC emission limitation of 0.85 ton (from cleanup usage).

Each report shall be submitted within 30 days after the deviation occurs.

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-10454, issued on September 10, 1998 (revised July 20, 2004): A.IV.1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

77.1 pounds OC/day from adhesives

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily allowable OC emission limitation through the record keeping required in Section A.III.1 of this permit.

1.b Emission Limitation:

7.3 tons OC/rolling, 12-month period from adhesives

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation through the record keeping required in Section A.III.2 of this permit.

1.c Emission Limitation:

169 pounds OC/month, from cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly allowable OC limitation through the record keeping required in Section A.III.2 of this permit.

1.d Emission Limitation:

0.85 ton OC/rolling, 12-month period, from cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC limitation through the record keeping required in Section A.III.2 of this permit.

V. Testing Requirements (continued)

1.e Emission Limitations:

0.10 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

1.f Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-10454, issued on September 10, 1998 (revised July 20, 2004): A.V.1 and A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

1. The OC emissions from emissions units R029 and P044 are generated from the application of coating (adhesive) and cleanup materials. Emissions from rubber curing are based on the emission factor of 0.000825 pound OC/pound of rubber cured, which was obtained from the Rubber Manufacturers Association "Emission Factors Development Project" manual, dated September, 1996. All OC emissions from rubber curing are assumed to be emitted from emissions unit P049.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
flock line #4 - adhesive booth, drying conveyor and flocking booth	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units P044 and R029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each unit's exhaust system, as specified by the permittee in the permit to install application. 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: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 3.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 353
MAGLC (ug/m3): 10,333

Pollutant: MEK
TLV (mg/m3): 584
Maximum Hourly Emission Rate (lbs/hr): 3.04
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 325
MAGLC (ug/m3): 13,904

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:

1.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;

III. Monitoring and/or Record Keeping Requirements (continued)

1.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,

1.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.).

2. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #2 Coating/Printing Operations 2 (R030)

Activity Description: Cascade Line #2 Spray Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Cascade line #2 spray booth #2	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	2.42 pounds organic compounds (OC)/hour, from the use of coatings 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R009, P055, R030 and P056, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the OC emission rates for emissions units R030 and the associated oven P056, the permittee shall utilize a value of 90 percent as the percentage of the OC employed in R030 that are emitted uncontrolled from R030. The remaining 10 percent of the OC employed in R030 shall be considered to be the uncontrolled emissions for P056. This "split" of OC emissions between R030 and P056 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds; and

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.

2. The permittee shall calculate and record the following information each month for emissions units R009, P055, R030 and P056, combined:

a. the company identification for each coating and cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each coating and cleanup material employed, in gallons;

d. the OC content of each coating and cleanup material employed, in pounds/gallon;

e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and

g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R009, P055, R030 and P056, combined). Each report shall be submitted within 30 days after the deviation occurs.

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

V. Testing Requirements

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

1.a Emission Limitations:

2.42 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 2.15 pounds OC/gallon and a maximum hourly usage rate of 1.25 gallons/hour for the coatings. A 90 percent/10 percent split between the spray booth and the oven (P056), was applied with 90 percent of the emissions emitted from the spray booth.

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

1.b Emission Limitation:

6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions, for emissions units R009, P055, R030 and P056, combined, from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

V. Testing Requirements (continued)

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EU-CC #3 Coating/Printing Operations 2 (R031)

Activity Description: Cascade Line #3 Spray Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Topcoat spray booth - Cascade line #3 spray booth #2, with dry filtration	OAC rule 3745-31-05(A)(3) PTI No. 03-13436	2.42 pounds organic compounds (OC)/hour, from the use of coatings 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year See Section A.I.2.a.
	OAC rule 3745-31-05(D) PTI No. 03-13436	6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emissions, for emissions units R007, P057, R031 and P058, combined, from the use of coatings and cleanup materials
	OAC rule 3745-17-11(B)(1)	See Section A.I.2.b.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-21-07(G)	See Section A.II.1.

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).

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

2.c For purposes of calculating the OC emission rates for emissions units R031 and the associated oven P058, the permittee shall utilize a value of 90 percent as the percentage of the OC employed in R031 that are emitted uncontrolled from R031. The remaining 10 percent of the OC employed in R031 shall be considered to be the uncontrolled emissions for P058. This "split" of OC emissions between R031 and P058 is based upon the results of emission testing performed by the permittee in January 1996. The "split" of OC emissions between this emissions units and the associated ovens shall be revised in accordance with the results of any future testing to determine the oven/booth split (weight %).

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each day for this emissions unit:

a. the company identification for each coating employed;

b. documentation on whether or not each coating employed is a photochemically reactive material.

c. the quantity of each coating employed, in gallons;

d. the OC content of each coating employed, in pounds/gallon;

e. the OC emissions for each coating employed (c x d), in pounds; and

f. the total potential (prior to applying the booth /oven "split") uncontrolled OC emissions for all the coatings employed (summation of "e" for all coatings), in pounds.

2. The permittee shall calculate and record the following information each month for emissions units R007, P057, R031 and P058, combined:

a. the company identification for each coating and cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

c. the quantity of each coating and cleanup material employed, in gallons;

d. the OC content of each coating and cleanup material employed, in pounds/gallon;

e. the OC emissions for each coating and cleanup material employed (c x d), in pounds;

f. the total OC emissions for all the coatings and cleanup materials employed (summation of "e" for all coatings + summation of "e" for cleanup materials), in pounds; and

g. the rolling, 12-month OC emission rate for all the coatings and cleanup materials employed, in tons.

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of the daily record indicating noncompliance.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons (for emissions units R007, P057,R031 and P058, combined). Each report shall be submitted within 30 days after the deviation occurs.

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

V. Testing Requirements

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

1.a Emission Limitations:

2.42 pounds OC/hour, from the use of coatings

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 2.15 pounds OC/gallon and a maximum hourly usage rate of 1.25 gallons/hour for the coatings. A 90 percent/10 percent split between the spray booth and the oven (P058), was applied with 90 percent of the emissions emitted from the spray booth.

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

1.b Emission Limitation:

6.5 tons OC/year, based upon a rolling, 12-month summation of the monthly emissions, for emissions units R007, P057, R031 and P058, combined, from the use of coatings and cleanup materials

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual OC emission limitation through the record keeping required in Section A.III.2 of this permit.

1.c Emission Limitations:

0.1 pound PE/hour, 0.44 ton PE/year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with Method 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tons/year PE limitation was developed by multiplying the pound/hour limitation by 8,760 and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

V. Testing Requirements (continued)

1.d Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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