

Facility ID: 0285030394 Issuance type: Final State Permit To Operate

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

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

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

[Go to Part II for Emissions Unit P900](#)

[Go to Part II for Emissions Unit R001](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0285030394 Emissions Unit ID: P900 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Tire Buffing System	OAC 3745-31-05 PTI #02-12561	1.57 lbs OC/hour and 6.9 TPY 0.87 lb PM/hour and 3.8 TPY
	OAC 3745-17-11	Equivalent to or less stringent than PTI limit
	OAC 3745-17-07 (A)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

2. **Additional Terms and Conditions**
 - (a) The hourly OC limit is based on this emissions unit's potential to emit [(3,014 pounds rubber processed per hour x 0.000521 pounds VOC per pound rubber* = 1.57 lbs VOC per hour, *Rubber Manufacturers Association (RMA) Emission Factors Development Project, September, 1996).] Therefore, no daily recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the number of tires produced per month for the purpose of determining annual OC emissions.

D. Reporting Requirements

1. None

E. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:
1.57 lbs OC/hour and 6.9 TPY

Applicable Compliance Method:
The hourly OC limit is based on this emissions unit's potential to emit. The annual OC emission is determined by the number of tires produced annually from the record keeping requirement.

Emission Limitation:
0.87 lb PM/hour and 3.8 TPY

Applicable Compliance Method:
OAC rule 3745-17-03(B)(10), if required.

Emission Limitation:
20% opacity except as provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1), if required.

F. Miscellaneous Requirements

1. None

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Facility ID: 0285030394 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Tire Cement Booth	OAC 3745-31-05 PTI #02-12561	4.13 pounds OC/hour and 18.1 TPY
	OAC 3745-21-07(G)(2)	Equivalent to or less stringent than OAC 3745-31-05

2. Additional Terms and Conditions

- (a) The hourly OC limit is based on this emission unit's potential to emit. Therefore, no record keeping, reporting are required with this limit.

B. Operational Restrictions

1. This facility shall only employ coatings and cleanup materials that are not "photochemically reactive materials".

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information monthly for the coating operation:
 - a. The company identification for each coating and cleanup material employed;
 - b. The determination of whether or not each material is a photochemically reactive material;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The organic compound content of each coating and cleanup material, in pounds per gallon; and
 - e. The total organic compound emission rate for all coatings and cleanup materials, in pounds per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit an annual report which summarizes the annual total OC emissions from this emissions unit. This report shall be submitted to the Ohio EPA, Northeast District Office by February 1 of each year and shall cover the operations of this emissions unit for the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

Use of only non-photochemically reactive materials

Applicable Compliance Method:

Compliance with this requirement shall be based on record keeping specified above.

Emission Limitations:

4.13 lbs OC/hour and 18.1 TPY from all coating and cleanup materials

Applicable Compliance Method:

The hourly OC limit is based on this emission unit's potential to emit. Compliance with the annual OC limit shall be based on the recordkeeping requirements in this permit. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: n-Hexane

TLV (ug/m3): 176,000

Maximum Hourly Emission Rate (lbs/hr): 4.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 258.6

MAGLC (ug/m3): 39,047

Pollutant: Cadmium*

TLV (ug/m3): 9.19

Maximum Hourly Emission Rate (lbs/hr): .000083

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): .10

MAGLC (ug/m3): .22

* The permittee performed modeling on all pollutants using an area model. All pollutants complied with their individual MAGLC. Cadmium represents the lowest TLV for all pollutants.

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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 specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.