



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

8/30/2012

Neil Dalton
SAS RUBBER COMPANY
1500 INDIANA ST
SALEM, VA 24153

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0243110176
Permit Number: P0107043
Permit Type: Renewal
County: Lake

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
SAS RUBBER COMPANY**

Facility ID:	0243110176
Permit Number:	P0107043
Permit Type:	Renewal
Issued:	8/30/2012
Effective:	8/30/2012
Expiration:	8/30/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
SAS RUBBER COMPANY

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Authorization

Facility ID: 0243110176
Application Number(s): A0040209
Permit Number: P0107043
Permit Description: PTIO Renewal permit for air conditioning hose manufacturing plant.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/30/2012
Effective Date: 8/30/2012
Expiration Date: 8/30/2022
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

SAS RUBBER COMPANY
471 NEWELL ST
PAINESVILLE, OH 44077

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

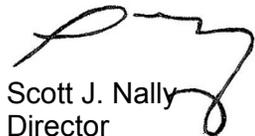
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107043

Permit Description: PTIO Renewal permit for air conditioning hose manufacturing plant.

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

Emissions Unit ID:	K001
Company Equipment ID:	ACH and PS Hose Mandrel Coating and Pretreatment
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	PS Braided Hose Cementer
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Banbury Mixer #4
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Microwave
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Autoclaves/Pot Heater
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Cement Spray Paint Booth
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Printer
Superseded Permit Number:	P0085021
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

B. Facility-Wide Terms and Conditions

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

C. Emissions Unit Terms and Conditions



1. K001, ACH and PS Hose Mandrel Coating and Pretreatment

Operations, Property and/or Equipment Description:

Roll Coating of Hose Mandrel

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(M).

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record daily or monthly the following information for the purpose of determining annual organic compound emissions:

- a. The company identification of each coating and cleanup material employed;
- b. The number of gallons of each coating and cleanup material employed;
- c. The organic compound content of each coating and cleanup material, in pounds per gallon;
- d. The total organic compound emission rate for all coating and cleanup materials, in pounds per day or pounds per month;
- e. The total organic compound emission from all coatings and cleanup materials in pounds per year;
- f. The total organic compound emissions from all coatings and cleanup materials in tons per year.

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

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall submit annual reports to the Ohio EPA that specify the Potential to Emit (PTE) of individual and total combined HAPs from this emission unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Sections 1.d)(1) of these terms and conditions.

[Note: Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleaning material.]

g) Miscellaneous Requirements

(1) None.



2. K004, PS Braided Hose Cementer

Operations, Property and/or Equipment Description:

Airgun spray coating operation

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(M).

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record daily or monthly the following information for the purpose of determining annual organic compound emissions:

- a. The company identification of each coating and cleanup material employed;
- b. The number of gallons of each coating and cleanup material employed;
- c. The organic compound content of each coating and cleanup material, in pounds per gallon;
- d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day or pounds per month;
- e. The total organic compound emission from all coatings and cleanup materials in pounds per year;
- f. The total organic compound emissions from all coatings and cleanup materials in tons per year.

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

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall submit annual reports to the Ohio EPA that specify the Potential to Emit (PTE) of individual and total combined HAPs from this emission unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Sections 2.d)(1) of these terms and conditions.

[Note: Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleaning material.]

g) Miscellaneous Requirements

(1) None.



3. P001, Banbury Mixer #4

Operations, Property and/or Equipment Description:

Batch mixer for uncured rubber controlled by a baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-17-11(A), Particulate Emissions (PE) shall not exceed 4.5 pounds per hour. Row b: OAC rule 3745-17-07(A), Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Baghouse Operational Restrictions:

a. The pressure drop across the baghouse serving this emissions unit shall be maintained within the range of 2-5 inches of water while the emissions unit is in operation.

- b. The operational pressure drop range across the baghouse may be adjusted with manufacturer's assurance of adequate control and with prior, written approval from Ohio EPA.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall properly operate and maintain the equipment to monitor the pressure drop across the baghouse while the emission unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (2) The permittee shall record the pressure drop across the baghouse on a weekly basis.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is

recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

Particulate emissions shall not exceed 4.5 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing in accordance with US EPA Test Method 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



4. P006, Microwave

Operations, Property and/or Equipment Description:

Continuous curing microwave

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-21-07(G)(2), and OAC rule 3745-21-07(M).

(2) Additional Terms and Conditions

a. The requirements of OAC 3745-21-07(M) are not applicable because there is no control device for this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of tons of rubber products cured;
 - b. The total organic compound emission rate, in pounds per day;
 - c. The total number of hours the emissions unit was in operation; and
 - d. The average hourly organic compound emission rate, in pounds per hour (average).
- (2) The permit to install for this emissions unit (P006) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's 'Review of New Sources of Air Toxic Emissions' policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN2 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the 'worst case' pollutants:

Pollutant-Toluene

TLV ($\mu\text{g}/\text{m}^3$) - 188,000

Maximum Hourly Emission Rate (lb/hr) - 0.32

Predicted 1-hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$) - 225.3

MAGLC ($\mu\text{g}/\text{m}^3$) - 4,476

Physical changes to or in the method of operation of the emissions unit after installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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 the "Air Toxic Policy" including 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 "TLV/BEI Handbook" published by the 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) 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 the 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.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that include the following information:
 - a. Identification of each day during which the average hourly organic compound emissions from this emission unit exceeded 1.21 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - (2) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous year.
 - (3) The permittee shall submit annual reports to the Ohio EPA that specify the Potential To Emit (PTE) of individual and total combined HAPs from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- Organic Compound (OC) emissions shall not exceed 1.21 pounds per hour.
- Applicable Compliance Method:
- Compliance shall be determined by multiplying the Rubber Manufacturing Association's emission factor of 1.84 pound of organic compounds per ton of rubber cured by the average hourly and total daily production of cured rubber. If required, emissions limitation shall be determined in accordance with USEPA Test Method 25 of 40 CFR Part 60, Appendix A
- b. Emission Limitation:
- OC emissions shall not exceed 5.3 tons per year.
- Applicable Compliance Method:
- Compliance shall be determined based upon the recordkeeping requirements specified in Section 4.d)(1).
- g) Miscellaneous Requirements
- (1) None.



5. P007, Autoclaves/Pot Heater

Operations, Property and/or Equipment Description:

Batch autoclave

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-21-07(G)(2), This rule is no longer applicable. Row b: OAC rule 3745-21-07(M), See b)(2)a.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

c) Operational Restrictions

(1) None.

- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) The permittee shall submit annual reports to the Ohio EPA that specify the Potential to Emit (PTE) of individual and total combined HAPs from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.



6. R003, Cement Spray Paint Booth

Operations, Property and/or Equipment Description:

Cement spray paint booth

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #02-5827)	Organic Compound (OC) emissions shall not exceed 7.3 tons per year.
b.	OAC rule 3745-21-07(G)(2)	This rule is no longer applicable.
c.	OAC rule 3745-21-07(M)	See b)(2)a.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record daily or monthly the following information for the purpose of determining annual organic compound emissions:

- a. The company identification of each coating and cleanup material employed;
- b. The number of gallons of each coating and cleanup material employed;
- c. The organic compound content of each coating and cleanup material, in pounds per gallon;
- d. The total organic compound emissions rate for all coatings and cleanup materials, in pounds per day or pounds per month;
- e. The total organic compound emissions from all coatings and cleanup materials, in pounds per year;
- f. The total organic compound emissions from all coatings and cleanup materials in tons per year.

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

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Sections 6.d)(1) of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

- g) Miscellaneous Requirements
 - (1) None.



7. R004, Printer

Operations, Property and/or Equipment Description:

Offset printing press with hose line feed

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3) and OAC rule 3745-21-07(G)(2).

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emission unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record daily or monthly the following information for the purpose of determining annual organic compound emissions:
 - a. The company identification of each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The organic compound content of each coating and cleanup material, in pounds per gallon;
 - d. The total organic compound emissions rate for all coating and cleanup materials, in pounds per day or pounds per month;
 - e. The total organic compound emissions from all coating and cleanup materials, in pounds per year;
 - f. The total organic compound emissions from all coatings and clean up materials in tons per year.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. Identification of each day during which the average hourly organic compound emissions from all coatings and cleanup materials exceeded 1.58 pounds per hour, and the actual average organic compound emissions for each such day; and
- (2) The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic Compound (OC) emissions shall not exceed 1.58 pounds per hour.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements in Section 7.d)(1) of these terms and conditions.

b. Emission Limitation:

OC emissions shall not exceed 6.92 tons per year.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Sections 7.d)(1) of these terms and conditions. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.