



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
HANCOCK COUNTY
Application No: 03-07462

DATE: 10/5/2000

Cooper Tire & Rubber Company
Blandey Doll
701 Lima Ave
Findlay, OH 45840-2315

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive, flowing style.

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/5/2000
Effective Date: 10/5/2000**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-07462

Application Number: **03-07462**
APS Premise Number: **0332010003**
Permit Fee: **\$0**
Name of Facility: **Cooper Tire & Rubber Company**
Person to Contact: **Blandey Doll**
Address: **701 Lima Ave
Findlay, OH 458402315**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**701 Lima Avenue
Findlay, OHIO**

Description of modification:
Modification to PTI #03-07462 issued 12/29/94 to align terms and conditions with Title V terms and conditions for the facility.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

Cooper Tire & Rubber Company

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C) (4) (b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Cooper Tire & Rubber Company** located in **HANCOCK** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>		
				<u>NG lb/hr</u>	<u>#2 Oil lb/hr</u>	
B006	168.1 MMBTU/hr NG/#2 Oil Fired Boiler	Use of low NO _x Burners and Compliance with Terms and Conditions of this permit	3745-31-05	TSP	1.25	2.40
			3745-18-04	SO ₂	<0.10	85.10
			3745-17-10	VOC	0.91	0.24
			3745-17-07	CO	13.84	5.99
			3745-23-06	NO _x	24.71	33.56
			NSPS 40 CFR 60 Subpart Db			

**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	NO _x
TSP	
SO ₂	
VOC	
CO	

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Tons/Year

NG #2 Oil

5.48	7.60
<0.44	269.80
3.99	0.80
60.62	19.00
108.25	106.40

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NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B006	168.1 MMBTU/hr NG/#2 Oil Fired Boiler	Db

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

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and OEPA Northwest District Office - DAPC
347 North Dunbridge Road, P.O. box 466
Bowling Green, Ohio 4

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source

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operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

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- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

Source

Pollutant(s)

B006

SO₂, NO_x

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office, DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. This permit allows for the installation of a new 168.1 MMBTU/hr NG/#2 oil fired boiler (B006) which will replace the existing 85 MMBTU/hr coal fired boiler (B004) as the main boiler at the facility. The coal fired boiler may continue to be operated on a standby basis (only one boiler will be allowed to operate at one time except during the startup and shutdown periods) and will be restricted in its operation as detailed below.
2. Cooper Tire and Rubber Company shall install low NO_x burners in the proposed boiler (B006).
3. Cooper Tire and Rubber Company shall install, calibrate, maintain and operate continuous monitoring systems for measuring the nitrogen oxide emissions in source B006 according to 40 CFR 60.48b.
4. Cooper Tire and Rubber Company shall install, calibrate and maintain and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system.
5. Cooper Tire and Rubber Company shall operate boiler B006 so that it does not exceed the following fuel usage restrictions:
 - A. 7.6 million gallons per rolling 12 month period of No. 2 oil at 0.5% sulfur content in boiler B006.

For the first year of operation, Cooper Tire and Rubber Company shall not use more than the following gallons of No. 2 oil in the time frame indicated below:

<u>Month</u>	<u>Cumulative Number of Gallons</u>
1	760,000
2	1,520,000
3	2,280,000
4	3,040,000
5	3,800,000
6	4,560,000
7	5,370,000
8	6,080,000
9	6,840,000

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10	7,600,000
11	7,600,000
12	7,600,000

After the first year of operation, Cooper Tire and Rubber Company shall use a rolling 12 month total for No. 2 fuel oil usage—not to exceed 7.6 million gallons per rolling 12 month period as noted above.

B. Natural gas may be used at any time in replacement of No. 2 oil in boiler B006.

6. Requirements for the Sampling and Analysis of Oil Burned in Fuel Burning Equipment and for the Reporting of the Oil Quality:

This facility shall submit to the NWDO, on a quarterly basis copies of the oil supplier's analyses for each shipment of oil which is received for burning in source B006. The oil supplier's analysis shall document the sulfur content (percent) and heat content (BTU/gallons) of each shipment of oil and shall certify that the oil meets the specifications for fuel oil #2 of the American Society for Testing and Materials' Standard Specification for Fuel Oils, ASTM D396-78.

The following information shall also be submitted with copies of the oil analysis:

- A. the total quantity of oil received in each shipment (gallons);
- B. the weighted* average sulfur content (percent) of the oil received during the calendar quarter; and
- C. the weighted* average heat content (BTU/gallon) of the oil received during the calendar quarter.

*In proportion to the quantity of oil received in each shipment during the calendar month.

7. Cooper Tire and Rubber Company shall not use more than 2,330 tons of coal per 12 month rolling total in the existing boiler (B004). The weighted average sulfur content of the coal burned shall not exceed 1%. Based on the coal usage restriction, boiler, B004 is now restricted to the following annual emission limitations: 6.32 TPY TSP; 5.83 TPY CO; 0.06 TPY VOC; 15.97 TPY NO_x; 44.27 TPY SO₂. These annual limitations supersede previously permitted annual emission limits for source B004.

This facility shall submit to the Ohio EPA field office, on a quarterly basis, copies of the coal supplier's analyses (wet and dry) for each shipment of coal which is received for burning in this source. The coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (BTU/lb) of each shipment of coal. The following information shall also be included with the copies of the coal supplier's analyses:

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- A. the total quantity of coal received in each shipment (tons);
- B. the weighted* average ash content (percent) of the coal received during each calendar month;
- C. the weighted* average sulfur content (percent) of the coal received during each calendar month;
- D. the weighted* average heat content (BTU/lb) of the coal received during each calendar month;
and
- E. the weighted* average sulfur dioxide emission rate (lbs SO₂/10⁶ BTU actual heat input) from the coal received each calendar month.

*In proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by January 15, April 15, July 15, and October 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

8. Cooper Tire and Rubber Company shall keep monthly records of all fuel burned in boilers B004 and b006.
 - A. For Source "B006":

number of gallons No. 2 fuel oil;
the heat content in BTU/gallon;
the percent of sulfur by weight; and
the percent of ash by weight.
 - B. For source "B004":

the tons of coal burned;
the heat content in BTU/gallon;
the percent of sulfur by weight; and
the percent of ash by weight.

The above records shall be tabulated on a rolling 12 month basis.

These monthly records, as well as any supporting computations, shall be retained in the company's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the director for review during normal business hours.

Cooper Tire and Rubber Company shall submit a quarterly report summarizing these monthly records. The report shall be submitted by January 15, April 15, July 15 and October 15 of each calendar year and shall cover the data obtained during the previous three months.

9. As specified in 40 CFR 60.49b(g) Cooper Tire and Rubber Company shall maintain daily records of the

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following information for boiler B006:

- A. calendar date;
 - B. the average hourly nitrogen oxides emissions rates (expressed as NO₂) (lb/million BTU heat input) measured or predicted;
 - C. the 30-day average nitrogen oxides emission rates (lb/million BTU heat input) calculated at the end of each day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 days;
 - D. identification of operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;
 - E. identification of operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
 - F. identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
 - G. identification of "F" factor used for calculations, method of determination, and type of fuel combusted;
 - H. identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system;
 - I. description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance specification 9B or 9c, as per 60.49b(g)(2) and (3), using the applicable performance specifications in 40 CFR 60, Appendix B; and
 - J. results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1.
10. Cooper Tire and Rubber Company shall submit a quarterly report containing the information recorded under condition #9. All reports shall be submitted as per condition #8.
 11. Cooper Tire and Rubber Company shall submit excess emission reports for any calendar quarter during which there are excess emissions from the affected facility. If there are no excess emissions during the

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calendar quarter, the company shall submit a quarterly report stating that no excess emissions occurred during the quarter reporting period.

12. Cooper Tire and Rubber Company may apply for a different method to sample and analyze #2 oil and coal as outlined on additional Special Terms and conditions #6 and #7. However, the company must submit the proposal to the Ohio EPA for approval prior to the implementation.
13. The performance test for SO₂ and NO_x emissions for boiler (B006) shall only be required if the boiler operates on No. 2 oil for more than 30 consecutive operating days.
14. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be submitted to or made to the following Ohio EPA field office:

Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge road
Bowling Green, Ohio 43402