



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
HANCOCK COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-13823

DATE: 8/14/2003

Cooper Tire and Rubber Co
Blandey Doll
701 Lima Ave
Findlay, OH 45840

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/14/2003
Effective Date: 8/14/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13823

Application Number: 03-13823
APS Premise Number: 0332010003
Permit Fee: **\$0**
Name of Facility: Cooper Tire and Rubber Co
Person to Contact: Blandey Doll
Address: 701 Lima Ave
Findlay, OH 45840

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

Description of proposed emissions unit(s):
Administrative modification to revise terms and conditions.

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

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

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, 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.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, 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 taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- 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 are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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.

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

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declared invalid.

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. 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.

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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping of state-only enforceable 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 (a) any deviations (excursions) from state-only required 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, (b) the probable cause of such deviations, and (c) 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. 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.)

3. 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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

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within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

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This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. 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.

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

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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC | 36.27 |
| PE | 1.98 |

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Rubber Tire Production, 40 CFR Part 63, Subpart XXXX. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.
2. If the final MACT standard is not promulgated by May 15, 2004, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted no later than May 15, 2004 (this date may be changed to May 15, 2003 as a result of a settlement between the U.S. EPA and the Sierra Club), and must contain the following information:
 - a. For a new affected source, the anticipated date of startup of operation;
 - b. The hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
 - c. Any existing federal, State, or local limitations or requirements applicable to the affected source;
 - d. For each affected emission point or group of affected emission points, an identification of control technology in place;
 - e. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
 - f. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of the 40 CFR Part 63.

The Part II application for a MACT determination may, but is not required to, contain the following information:

- a. Recommended emission limitation for the affected source and support information (the permittee may recommend a specific design, equipment, work practice, or operations standard or combination thereof, as an emission limitation);
- b. A description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control

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efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and

- c. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
3. If the NESHAP is promulgated before May 15, 2004, the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
- a. Within 120 days after promulgation of 40 CFR Part 63, Subpart XXXX, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):
 - i. The name and mailing address of the permittee;
 - ii. The physical location of the source if it is different from the mailing address;
 - iii. Identification of the relevant MACT standard and the source's compliance date;
 - iv. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and
 - v. A statement confirming the facility is a major source for HAPs.
 - b. Within 60 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63, Subpart XXXX, the permittee shall submit a notification of compliance status that contains the following information:
 - i. The methods used to determine compliance;
 - ii. The results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. The methods that will be used for determining compliance, including a description of monitoring and reporting requirements and test methods;
 - iv. The type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart XXXX.

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- v. An analysis demonstrating whether the affected source is a major source or an area source;
- vi. A description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- vii. A statement of whether or not the permittee has complied with the requirements of 40 CFR Part 60, Subpart XXXX.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|---|--------------------------------------|---|
| P136 - Banbury Mixer #4 (Final/Silica Mixer - Modification of PTI #03-7444 issued on 8/18/93 to establish OC limits and to allow for the mixing of silica compound) | OAC rule 3745-31-05 (A)(3) | Control requirements (see A.I.2.e) 0.15 lb of PE/hour; 0.66 ton of PE/year 10% opacity as a six-minute average 5.26 lbs of OC/hour 33.60 tons of OC/year for emissions units P136, P137, & P140 combined (See A.I.2.a & A.I.2.d) |
| | OAC rule 3745-21-07 (G)(2) | See A.II.1 |
| | OAC rule 3745-17-11 (B)(2) | See A.I.2.b |
| | OAC rule 3745-17-07 (A)(1) | See A.I.2.c |

2. Additional Terms and Conditions

- 2.a The annual limitation represents potential emissions from emissions units P136, P137, and P140 combined based on inherent physical limitations associated with the production of mixed rubber. Emissions units P136, P137, and P140 (Banbury Mixers #4, #3, & #5 respectively) are used to produce mixed rubber (both regular and silica rubber) which is utilized in subsequent manufacturing processes for the production of pneumatic tires. The production of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, organic emissions are physically

Emissions Unit ID: **P136**

limited to 33.60 tons per year from these three emissions units.

- 2.b** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.
- 2.c** This emissions unit is exempt from the visible PE 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.d** All OCs are assumed to be volatile organic compounds (VOC).
- 2.e** Best available technology (BAT) control requirement for this emissions unit has been determined to be use of a baghouse control system with a 95% removal efficiency.

II. Operational Restrictions

- 1.** The pressure drop across the baghouse shall be maintained within the range of 1 - 6 inches of water while the emissions unit is in operation. The listed pressure drop range shall apply at all times except during periods of rebagging until sufficient filter cake has developed on the bags.

III. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:
 - a.** Identification of each type of mixing operation performed (master mixing, final mixing, 2nd pass silica mixing, or 3rd pass silica mixing);
 - b.** Amount of rubber, in pounds, mixed for each type of mixing operation;
 - c.** Calculated OC emissions from each type of mixing operation using the following equation:

$$\text{lbs OC emissions} = (\text{lbs of rubber mixed}) \times (\text{OC emission factor* in lbs OC/lb rubber})$$

* OC emission factors from AP-42, Section 4.12 and from stack testing performed by the company shall be used in the emission calculation.
 - d.** Total OC emissions from all mixing operations, in pounds (summation of A.III.2.c for all types of mixing operations); and
 - e.** The annual, year to date OC emissions from all mixing operations (summation of A.III.2.d from January to December).

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2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in section A.II.1 above. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- a. Emission Limitation
5.26 lbs of OC/hour

Applicable Compliance Method

The hourly limitation represents the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25, or 25A, 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit is based on a maximum hourly rubber throughput (silica mix) and an emission factor of OC/lb of rubber mixed (based on an April 2002 stack test).

- b. Emission Limitation
33.60 tons of OC/year (for emissions units P136, P137, and P140 combined)

Applicable Compliance Method

Compliance with the annual limitation shall be based on record keeping requirements in section A.III.2.

- c. Emission Limitation
0.15 lb of PE/hour

Applicable Compliance Method

This hourly limitation is based on the potential to emit* for this emissions unit. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

Emissions Unit ID: P136

* The potential to emit for this emissions unit is based on a 1998 stack test

- d. Emission Limitation
 0.66 ton of PE/year

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs per ton.

- e. Emission Limitation
 10% opacity as a six-minute average

Applicable Compliance Method

If required, compliance shall be demonstrated by the procedures in Method 9 of 40 CFR Part 60, Appendix A.

2. The permittee shall conduct, or have conducted, emission testing for emissions unit P136, P137, or P140 in accordance with the following requirements:
- a. The emission testing shall be conducted within six months after the facility has achieved a production level involving silica mixing which would allow for three test runs (each a minimum of one hour in duration) performed in accordance with the methods specified in section A.V.2.c.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of OC for emissions unit P136, P137, or P140.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate and verify OC emission factors: U.S. EPA Methods 1 - 4, and 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). The notification shall indicate the specific emissions unit which will be tested as required in A.V.2.b. Accompanying the specified emissions unit should be documentation which outlines why the proposed testing is representative of worst-case mixing operations. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Office's refusal to accept

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the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|---|--------------------------------------|--|
| P136 - Banbury Mixer #4 (Final/Silica Mixer - Modification of PTI #03-7444 issued on 8/18/93 to establish OC limits and to allow for the mixing of silica compound) | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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PTI A

Modification Issued: 8/14/2003

Emissions Unit ID: **P136**

VI. Miscellaneous Requirements

None

Coope

PTI A

Modification Issued: 8/14/2003

Emissions Unit ID: P137

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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> |
|--|--------------------------------------|---|
| P137 - Banbury Mixer #3 (Master/Final/Silica Mixer - Modification of PTI #03-7973 issued on 6/22/94 to establish OC limits and to allow for the mixing of silica compound) | OAC rule 3745-31-05 (A)(3) | Control requirements (see A.I.2.e) 0.15 lb of PE/hour; 0.66 ton of PE/year 10% opacity as a six-minute average 5.26 lbs of OC/hour 33.60 tons of OC/year for emissions units P136, P137, & P140 combined (See A.I.2.a & A.I.2.d) |
| | OAC rule 3745-21-07 (G)(2) | See A.II.1 |
| | OAC rule 3745-17-11 (B)(2) | See A.I.2.b |
| | OAC rule 3745-17-07 (A)(1) | See A.I.2.c |

2. Additional Terms and Conditions

- 2.a The annual limitation represents potential emissions from emissions units P136, P137, and P140 combined based on inherent physical limitations associated with the production of mixed rubber. Emissions units P136, P137, and P140 (Banbury Mixers #4, #3, & #5 respectively) are used to produce mixed rubber (both regular and silica rubber) which is

utilized in subsequent manufacturing processes for the production of pneumatic tires. The production of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, organic emissions are physically limited to 33.60 tons per year from these three emissions units.

- 2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.
- 2.c This emissions unit is exempt from the visible PE 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.d All OCs are assumed to be volatile organic compounds (VOC).
- 2.e Best available technology (BAT) control requirement for this emissions unit has been determined to be use of a baghouse control system with a 95% removal efficiency.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 - 6 inches of water while the emissions unit is in operation. The listed pressure drop range shall apply at all times except during periods of rebagging until sufficient filter cake has developed on the bags.

III. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:
 - a. Identification of each type of mixing operation performed (master mixing, final mixing, 2nd pass silica mixing, or 3rd pass silica mixing);
 - b. Amount of rubber, in pounds, mixed for each type of mixing operation;
 - c. Calculated OC emissions from each type of mixing operation using the following equation:
$$\text{lbs OC emissions} = (\text{lbs of rubber mixed}) \times (\text{OC emission factor* in lbs OC/lb rubber})$$

Emissions Unit ID: P137

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

- d. Total OC emissions from all mixing operations, in pounds (summation of A.III.2.c for all types of mixing operations); and
 - e. The annual, year to date OC emissions from all mixing operations (summation of A.III.2.d from January to December).
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in section A.II.1 above. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- a. Emission Limitation
5.26 lbs of OC/hour

Applicable Compliance Method

The hourly limitation represents the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, 18, 25, or 25A, 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit is based on a maximum hourly rubber throughput (silica mix) and an emission factor of OC/lb of rubber extruded (based on an April 2002 stack test).

- b. Emission Limitation
33.60 tons of VOC/year (combined emission limit from mixing for P136, P137, and P140)

Applicable Compliance Method

Compliance with the annual limitation shall be based on record keeping requirements in section C.2.

- c. Emission Limitation
0.15 lb of PE/hour

Applicable Compliance Method

This hourly limitation is based on the potential to emit* for this emissions unit. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit is based on a 1998 stack test

- d. Emission Limitation
0.66 ton of PE/year

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs per ton.

- e. Emission Limitation
10% opacity as a six-minute average

Applicable Compliance Method

If required, compliance shall be demonstrated by the procedures in Method 9 of 40 CFR Part 60, Appendix A.

2. The permittee shall conduct, or have conducted, emission testing for emissions unit P136, P137, or P140 in accordance with the following requirements:
- The emission testing shall be conducted within six months after the facility has achieved a production level involving silica mixing which would allow for three test runs (each one hour minimum in duration) performed in accordance with the methods specified in section A.V.2.c.
 - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of OC for emissions unit P136, P137, or P140.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate and verify OC emission factors: U.S. EPA Methods 1 - 4, and 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior

approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). The notification shall indicate the specific emissions unit which will be tested as required in A.V.2.b. Accompanying the specified emissions unit should be documentation which outlines why the proposed testing is representative of worst-case mixing operations. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Office's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|--|--------------------------------------|--|
| P137 - Banbury Mixer #3 (Master/Final/Silica Mixer - Modification of PTI #03-7973 issued on 6/22/94 to establish OC limits and to allow for the mixing of silica compound) | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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PTI Application: 02 12022
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Facility ID: 0332010003

Emissions Unit ID: **P137**

VI. Miscellaneous Requirements

None

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PTI A

Modification Issued: 8/14/2003

Emissions Unit ID: P140

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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> |
|--|--------------------------------------|---|
| P140 - Banbury Mixer #5 (Final/Silica Mixer - Modification of PTI #03-8236 issued on 9/8/94 to establish OC limits and to allow for the mixing of silica compound) | OAC rule 3745-31-05 (A)(3) | Control requirements (see A.I.2.e) 0.15 lb of PE/hour; 0.66 ton of PE/year 10% opacity as a six-minute average 5.26 lbs of OC/hour 33.60 tons of OC/year for emissions units P136, P137, & P140 combined (See A.I.2.a & A.I.2.d) |
| | OAC rule 3745-21-07 (G)(2) | See A.II.1 |
| | OAC rule 3745-17-11 (B)(2) | See A.I.2.b |
| | OAC rule 3745-17-07 (A)(1) | See A.I.2.c |

2. Additional Terms and Conditions

- 2.a The annual limitation represents potential emissions from emissions units P136, P137, and P140 combined based on inherent physical limitations associated with the production of mixed rubber. Emissions units P136, P137, and P140 (Banbury Mixers #4, #3, & #5 respectively) are used to produce mixed rubber (both regular and silica rubber) which is

utilized in subsequent manufacturing processes for the production of pneumatic tires. The production of regular or silica mixed rubber involves multiple types of batch mixing operations performed sequentially. Based on the capability of a mixer to only be able to perform certain types of mixing operations, differing mixer batch capacities, and differing emission levels based on the type of mixing operation, organic emissions are physically limited to 33.60 tons per year from these three emissions units.

- 2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.
- 2.c This emissions unit is exempt from the visible PE 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.d All OCs are assumed to be volatile organic compounds (VOC).
- 2.e Best available technology (BAT) control requirement for this emissions unit has been determined to be use of a baghouse control system with a 95% removal efficiency.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 - 6 inches of water while the emissions unit is in operation. The listed pressure drop range shall apply at all times except during periods of rebagging until sufficient filter cake has developed on the bags.

III. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information each month for emissions units P136, P137, and P140 combined:
 - a. Identification of each type of mixing operation performed (master mixing, final mixing, 2nd pass silica mixing, or 3rd pass silica mixing);
 - b. Amount of rubber, in pounds, mixed for each type of mixing operation;
 - c. Calculated OC emissions from each type of mixing operation using the following equation:

$$\text{lbs OC emissions} = (\text{lbs of rubber mixed}) \times (\text{OC emission factor* in lbs OC/lb rubber})$$

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

- d. Total OC emissions from all mixing operations, in pounds (summation of A.III.2.c for all types of mixing operations); and
 - e. The annual, year to date OC emissions from all mixing operations (summation of A.III.2.d from January to December).
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in section A.II.1 above. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- a. Emission Limitation
5.26 lbs of OC/hour

Applicable Compliance Method

The hourly limitation represents the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, 18, 25, or 25A, 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit is based on a maximum hourly rubber throughput (silica mix) and an emission factor of OC/lb of rubber extruded (based on an April 2002 stack test).

Emissions Unit ID: P140

- b. Emission Limitation
33.60 tons of VOC/year (combined emission limit from mixing for P136, P137, and P140)
- Applicable Compliance Method
Compliance with the annual limitation shall be based on record keeping requirements in section C.2.
- c. Emission Limitation
0.15 lb of PE/hour
- Applicable Compliance Method
This hourly limitation is based on the potential to emit* for this emissions unit. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.
- * The potential to emit for this emissions unit is based on a 1998 stack test
- d. Emission Limitation
0.66 ton of PE/year
- Applicable Compliance Method
Compliance with the above emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs per ton.
- e. Emission Limitation
10% opacity as a six-minute average
- Applicable Compliance Method
If required, compliance shall be demonstrated by the procedures in Method 9 of 40 CFR Part 60, Appendix A.
2. The permittee shall conduct, or have conducted, emission testing for emissions unit P136, P137, or P140 in accordance with the following requirements:
- a. The emission testing shall be conducted within six months after the facility has achieved a production level involving silica mixing which would allow for three test runs (each one hour minimum in duration) performed in accordance with the methods specified in section A.V.2.c.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of OC for emissions unit P136, P137, or P140.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate and verify OC emission factors: U.S. EPA Methods 1 - 4, and 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior

approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). The notification shall indicate the specific emissions unit which will be tested as required in A.V.2.b. Accompanying the specified emissions unit should be documentation which outlines why the proposed testing is representative of worst-case mixing operations. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Office's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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> |
|--|--------------------------------------|--|
| P140 - Banbury Mixer #5 (Final/Silica Mixer - Modification of PTI #03-8236 issued on 9/8/94 to establish OC limits and to allow for the mixing of silica compound) | None | None |

2. Additional Terms and Conditions

- 2.a 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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PTI A

Modification Issued: 8/14/2003

Emissions Unit ID: P150

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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> |
|--|--------------------------------------|--|
| P150 - 10" x 6" Cold Feed Pin Barrel Tread Line Extruder (Modification of PTI #03-9988 issued on 4/1/98 to increase current OC emission limitations and to allow for the extruding of silica compound) | OAC rule 3745-31-05 (A)(3) | 0.61 lb of OC/hour; 2.67 tons of OC/year See A.I.2.b |
| | OAC rule 3745-21-07 (G) | See A.I.2.a |

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.
- 2.b All OCs are assumed to be volatile organic compounds (VOC).

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

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Coope

PTI A

Modification Issued: 8/14/2003

Emissions Unit ID: **P150**

None

V. Testing Requirements

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

- a. Emission Limitation
0.61 lb of OC/hour

Applicable Compliance Method

The hourly limitation represents the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, 18, 25, or 25A, 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit is based on a maximum hourly rubber throughput and an emission factor of OC/lb of rubber extruded (based on results of an April 2002 stack test).

- b. Emission Limitation
2.67 tons of OC/year

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 lbs per ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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> |
|--|--------------------------------------|--|
| P150 - 10" x 6" Cold Feed Pin Barrel Tread Line Extruder (Modification of PTI #03-9988 issued on 4/1/98 to increase current OC emission limitations and to allow for the extruding of silica compound) | None | None |

2. Additional Terms and Conditions

2.a 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 Ohio EPA's "Air Toxics Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.