



**Environmental
Protection Agency**

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

9/19/2012

Certified Mail

Tom DeNoi
Titan Tire Corporation of Bryan
927 S. Union Street
Bryan, OH 43506

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0386010003
Permit Number: P0109768
Permit Type: OAC Chapter 3745-31 Modification
County: Williams

No	TOXIC REVIEW
Yes	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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Bryan Times. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-NWDO; Michigan; Indiana

PUBLIC NOTICE
9/19/2012 Issuance of Draft Air Pollution Permit-To-Install

Titan Tire Corporation of Bryan

927 S. Union Street,

Bryan, OH 43506

Williams County

FACILITY DESC.: Tire Manufacturing (except Retreading)

PERMIT #: P0109768

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Modification to existing tire building, curing and curing repair and finish area. Modification to add four (4) carcass/tire building areas, one (1) treading/belting operation, 25 curing presses, and increase paint usage associated with the existing curing repair and finish area.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at:

<http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

**STAFF DETERMINATION FOR THE APPLICATION TO CONSTRUCT
UNDER THE PREVENTION OF SIGNIFICANT DETERIORATION REGULATIONS
FOR TITAN TIRE CORPORATION – BRYAN OHIO
WILLIAMS COUNTY, OHIO
PTI NUMBER P0109768**

The Clean Air Act and regulations promulgated thereunder require that major air pollution sources undergoing construction or modification comply with all applicable Prevention of Significant Deterioration (PSD) provisions and nonattainment area New Source Review requirements. The federal PSD rules govern emission increases in attainment areas for major sources, which are sources with the potential to emit 250 tons per year or more of any pollutant regulated under the Clean Air Act, or 100 tons per year or more if the source is included in one of 28 source categories. In nonattainment areas, the definition of a major source is one having at least 100 tons per year potential emissions. A major modification is one resulting in a contemporaneous increase in emissions which exceeds the significance level of one or more pollutants. Any changes in actual emissions within a five-year period are considered to be contemporaneous. In addition, Ohio now has incorporated the PSD and NSR requirements by rule under OAC 3745-31.

Both PSD and nonattainment rules require that certain analyses be performed before a facility can obtain a permit authorizing construction of a new source or major modification to a major source. The principal requirements of the PSD regulations are as follows:

- 1) Best Available Control Technology (BACT) review - A detailed engineering review must be performed to ensure that BACT is being installed for the pollutants for which the new source is a major source.
- 2) Ambient Air Quality Review - An analysis must be completed to ensure the continued maintenance of the National Ambient Air Quality Standards (NAAQS) and that any increases in ambient air pollutant concentrations do not exceed the incremental values set pursuant to the Clean Air Act.

For nonattainment areas, the requirements are:

- 1) Lowest Achievable Emissions Rate (LAER) - New major sources must install controls that represent the lowest emission levels (highest control efficiency) that have been achieved in practice.
- 2) The emissions from the new major source must be offset by a reduction of existing emissions of the same pollutant by at least the same amount, and a demonstration must be made that the resulting air quality shows a net air quality benefit. This is more completely described in the Emission Offset Interpretative Ruling as found in Appendix S of 40 CFR Part 51.
- 3) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing State Implementation Plan (SIP) or are on an approved schedule resulting in full compliance with the SIP.

For rural ozone nonattainment areas, the requirements are:

- 1) LAER - New major sources must install controls that represent the lowest emissions levels (highest control efficiency) that have been achieved in practice.
- 2) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing SIP or are on an approved schedule resulting in full compliance with the SIP.

Finally, New Source Performance Standards (NSPS), SIP emission standards and public participation requirements must be followed in all cases.

Site/Facility Description

Titan Tire Corporation – Bryan Ohio is a tire manufacturing facility located in Williams County. Manufacturing operations include carcass and tire building, tire treading and belting, tire curing, and tire curing repair and finishing. Titan Tire Corporation is a Major PSD facility for volatile organic compounds (VOC).

Project Description

Titan Tire Corporation has submitted an application for a permit modification to address the following:

1) a proposed expansion to North Side tire building operations to respond to current market conditions and allow for greater production flexibility. Titan Tire Corporation’s tire building schedule is primarily driven by customer orders. The original design for the North Side tire building was focused on production of extremely large tires with operations designed and built to handle large tire with an inner bead diameter of 63 inches. In response to current market conditions, Titan is proposing installation of equipment to support slightly smaller tires (i.e. 49-57 inch inner bead diameter). The proposed equipment includes 4 carcass and tire building areas and 25 curing presses. The proposed equipment will ensure optimal flexibility in the North Side tire building operations;

2) address re-designation of emissions units and emissions unit descriptions to incorporate all tire building operations, including 10 carcass/tire building areas, and 2 treading/belting operations (consisting of one (1) belting station and two (2) treading stations) into a single emissions unit. The modification will also address permitting the existing twenty (20) previously “de minimis”* tire curing presses with the proposed twenty-five (25) new curing presses. Permitting will include designation of all existing and new curing presses into a single emissions unit;

*The existing 20 curing presses were “de minimis in accordance with OAC rule 3745-15-05 (C)(4). By combining all curing operations into one emissions unit along with potential emissions from all existing and new presses, curing operations are no longer qualify as “de minimis” sources under OAC rule 3745-15-05..

3) address emissions associated with painting of tires following repair in the North Side Curing Repair and Finish Area (emissions unit P016) that were not addressed in the previously issued permit (PTI 03-17392). In addition to including paint emissions that were not previously addressed, the company is requesting the VOC limits be updated to reflect additional utilization of emissions unit P016 due to the increased production associated with the new tire building and curing operations.

4) This permit action will supersede: PTI #03-17392, issued on June 5, 2008; and

5) This permit action includes the following emissions units:

Emissions Units Incorporated into PTI #P0109768
P010 – North Side Tire Building Area consisting of 10 carcass/tire building areas and 3 treading/belting operations. Each treading/belting operation consists of one (1) belting station and two (2) treading stations.
P016 – Curing Repair and Finish Area
P017 – North Side Curing Presses, consisting of 45 individual curing presses

Process Description

Titan Tire Corporation – Bryan Ohio produces larger tires, up to 63 inch in diameter, to support the mining and construction vehicle markets. Production operations include carcass and tire building areas where the tire “build-up” occurs through the manual application of different rubber layers of the tire upon a rotating drum. Additional production operations include treading and belting equipment, curing presses and a curing repair and finish area. VOC emissions are primarily generated from use of solvents (mainly heptane), cements, and tire paints.

Applicable Regulations

Federal Rules

40 CFR 60, Subpart BBB

Emissions unit at this facility are not applicable to the requirements of 40 CFR Part 60, Subpart BBB. The tires produced at the facility do not meet the definition of a tire as contained in 40 CFR 60.541 based on bead diameter and cross section specifications. The tires produced exceed the bead diameter specification of less than or equal to 0.5 meters (18.7 inches) and the cross section dimension specification of less than or equal to 0.325 meters (12.8 inches).

40 CFR Part 63, Subpart XXXX

40 CFR 63, Subpart XXXX established National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for rubber tire manufacturing. This subpart applies to a rubber tire manufacturing facility that is a major source of HAP. The current and post-modification facility-wide potential to emit for HAPs is less than 10 tons/yr for each individual HAP and less than 25 tons/yr of total HAPs. Thus, the Bran Facility is not a major source of HAP emissions and therefore, 40 CFR Part 63, Subpart XXXX is not applicable.

PSD Applicability

The applicability of Prevention of Significant Deterioration (PSD) is evaluated for proposed construction, reconstruction, and modification projects that result in an emission increase of a New Source Review (NSR)-regulated pollutant for which the area is in attainment with the National Ambient Air Quality Standards (NAAQS). Titan Tire Corporation – Bryan, Ohio is located in Williams County which has been designated in attainment or unclassifiable for all NSR regulated pollutants. Tire manufacturing is not one of the 28 listed source categories in OAC rule 3745-31-01 (LLL)(2)(a). Therefore this facility is subject to the general PSD major source threshold of 250 tons/yr provided in OAC rule 3745-31-01 (LLL)(2)(b).

Currently, Titan Tire Corporation – Bryan Ohio has a potential to emit VOC’s in excess of 250 tons/yr and therefore the facility is considered to be an existing major source with regards to the PSD program. VOC emissions associated with the PTI application for modification of PTI 03-17392, issued June 5, 2008 (proposed expansion of the North Side tire building operations) result in a VOC emissions increase triggering PSD review requirements. The potential to emit (PTE) increase associated with the proposed project will result in a VOC emissions increase of 107.04 tons/yr from tire building, curing, and curing repair and finish operations.

Note: Because Williams County is designated as attainment or unclassifiable for all NSR-regulated pollutants, NANSR does not apply to the proposed expansion.

Best Available Control Technology (BACT) analysis

BACT REVIEW

Based on the emissions increase associated with the proposed expansion of the North Side tire building at Titan Tire Corporation – Bryan Plant and the facility's status as an existing major source, the facility is subject to PSD review requirements for VOC emissions, including a Best Available Control Technology (BACT) analysis for all new or physically modified sources associated with the expansion. No existing emissions units at the Bryan facility will be physically modified as part of the expansion project and as such, those emissions units would not be required to be included in the BACT analysis.

Under Ohio's PSD rules (OAC rule 3745-31), each new major source and/or major modification must employ BACT for each pollutant for which the new source or modification is considered major. The following emissions units require a BACT analysis:

Emissions Units Requiring VOC BACT
P010 – North Side Tire Building Area consisting of 10 carcass/tire building areas and 3 treading/belting operations. Each treading/belting operation consists of one (1) belting station and two (2) treading stations.
P016 – Curing Repair and Finish Area
P017 – North Side Curing Presses, consisting of 45 individual curing presses

As part of the application for any emissions unit regulated under the PSD requirements, an analysis must be conducted that demonstrates that BACT will be employed for each affected pollutant.

Summary of BACT Requirements

BACT is defined as an emission limitation based on the maximum degree of reduction for each NSR regulated pollutant which would be emitted from any source which on a case-by-case basis is determined to be achievable taking into account the following three factors:

- 1) Environmental Impact;
- 2) Energy Impact; and
- 3) Economic Impact.

BACT analysis includes air pollution control technologies with the potential to be applied to the emission source for the pollutant under consideration. It is pertinent to point out that BACT must be no less stringent than limitations defined by the standard of a State Implementation Plan, a National Emission Standard for Hazardous Air Pollutants, or a New Source Performance Standard.

The BACT analysis requires a "Top-Down" approach consisting of five basic steps (*NSR Workshop Manual*), in which the first step is to determine for the emissions unit(s) in question, the most stringent control available for a similar or identical source or source category. If it can be shown that this level of control is technically, environmentally, or economically infeasible for the emissions unit(s) in question, then the next most stringent level of control is determined and similarly evaluated. The process continues until such time the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental or economic objections. Below are the five basic steps of a top-down BACT review as identified by USEPA:

- 1) Identify All Applicable Control Technologies;
- 2) Eliminate Technically Infeasible Control Technologies;

- 3) Rank Remaining Control Technologies by Control Effectiveness;
- 4) Evaluate Effective Controls and Document Results; and
- 5) Selecting BACT.

As can be seen from the list above, the final stage of the analysis is the actual selection of the most cost effective air pollution control device. The permitting authority generally sets levels for cost effectiveness. Once a cost-effective control device has been identified for a particular source, that device will be selected as BACT and will be implemented as part of the overall project for that source. If no control systems are deemed to be cost effective, BACT will be no abatement.

BACT Analysis: P010 - North Side Tire Building Area consisting of 10 carcass/tire building areas and 3 treading/belting operations. Each treading/belting operation consists of one (1) belting station and two (2) treading stations.

Significant Pollutant	BACT Requirement
VOC	<p>Emission standard of 6.00 lbs VOC/ton tire produced as a rolling, 12-month weighted average</p> <p>Use of work practice standards that are sufficient to ensure compliance with the lbs VOC/ton tire produced limitation</p> <p>Emission limitation of 197.07 tons VOC/rolling, 12-month period</p> <p>The BACT analysis determined than no add-on controls were cost-effective for the reduction of VOC's.</p>

The selected BACT for the North Side Tire Building area is an emission standard of 6.00 lbs VOC/ton tire produced as a rolling, 12-month weighted average along with work practice standards that are sufficient to ensure compliance with this limitation. In addition, BACT will also include and emission limitation of 197.07 tons VOC/rolling, 12-month period. All other VOC control technologies were either determined to be technically infeasible for the process or too costly to implement, which is consistent with recent BACT determinations found in the Reasonable Available Control Technology (RACT)/BACT/Lowest Achievable Emission Rate (LEAR) Clearinghouse (RBLC) database for tire building operations.

Using the “top-down” analysis, available control technologies were identified for this emission unit through the following methods:

1. researching the RBLC database;
2. surveying regulatory agencies;
3. drawing from previous engineering experience;
4. surveying air pollution control equipment vendors; and

5. surveying available literature.

After the control technologies were identified, an analysis was conducted to eliminate technically infeasible technology. In determining technical feasibility it was noted that these operations involve processing tires in excess of 15 feet in diameter and, upon completing, a weight of up to 12,000 pounds each. As a result and the height and weight of the tires, each tire must be transported using cranes and mobile lifting equipment. In addition, a technician must manually align, apply, and press the different layers and parts of the tire at a rotating drum-portion of a tire building machine. Because of the size of the tires, space need to manually build-up the tires on the rotating drum, and the access needed to transport materials and the tires to and from the tire building areas, it has been determined that it is not technically feasible to enclose the tire building areas for ventilation to a control device.

Therefore, all control cost evaluations were made based on routing the VOC laden air captured by the building ventilation system to the evaluated control device.

Once that analysis was complete, a cost analysis for each technically feasible control technology was completed. The technically feasible control technology cost analysis that were completed are as follows:

1. Regenerative Thermal Oxidizer – \$12,363/ton
2. Regenerative Catalytic Oxidizer - \$16,310/ton

It should be noted that the control costs evaluation associated with the existing North Side Tire Building Operations was conducted for the tire building areas and curing presses separately using the building ventilations systems located above the two distinct areas prior to installation of any of the emissions units. Based on an evaluation of the as-built equipment, the facility discovered that isolation of the tire building and curing operations is not practical. It was determined that although each operation is clustered in a separate part of the building, erection of barriers to block airflow would restrict access needed to transport tires between the two areas. Since it was determined that the tire building and curing areas cannot be isolated from each other, the facility has included combined VOC emissions and building airflow for all North Side operations (tire building and curing) to evaluate the control cost calculations for the proposed modification.

Also, in an effort to be conservative in determining cost feasibility for the control devices, the facility has applied the PTE from all North Side tire building and curing operations, rather than the emissions increase associated with the modification. In addition, calculated control costs are conservative in that they do not include the cost of ductwork needed to transfer air from the building air handling units to the control device.

A final note, the cost of using a concentrator as a control device was not evaluated in detail as a potential for lowering operating costs because it was not expected to decrease the overall costs significantly enough to make cost feasible, due to the high capital cost and reduction in overall VOC control efficiency.

BACT Analysis: P016 - Curing Repair and Finish Area

Significant Pollutant	BACT Requirement
VOC	Use of work practice standards that are sufficient to minimize VOC emissions from the tire repair and finish area Emission limitation of 5.17 tons VOC/rolling,

Significant Pollutant	BACT Requirement
	12-month period The BACT analysis determined than no add-on controls were cost-effective for the reduction of VOC's.

The selected BACT for the Curing Repair and Finish area is use of work practice standards that are sufficient to minimize VOC emissions from the tire repair and finish area. In addition, BACT will also include and emission limitation of 5.17 tons VOC/rolling, 12-month period. All other control technologies are either technically infeasible or too costly to implement. This BACT determination is consistent with recent BACT determinations found in the RBLC database for tire repair and finish areas.

Using the “top-down” analysis, available control technologies were identified for this emission unit through the same process used for emissions unit P010.

After the control technologies were identified, an analysis was conducted to eliminate technically infeasible technology. In determining technical feasibility it was noted that these operations involve processing tires in excess of 15 feet in diameter within a partial enclosure.

After determining technical feasibility a cost analysis for each technically feasible control technology was completed. The technically feasible control technology cost analysis that were completed are as follows:

1. Regenerative Thermal Oxidizer – \$154,266/ton
2. RCO - \$168,705/ton

Cost analysis included utilization of conservative assumptions for enclosure size, enclosure ventilation capture velocity, and total operating hours and excluded the capital costs of necessary ductwork. Also, as with the cost analysis for the North Side tire building and curing, the facility took the conservative approach of applying the PTE VOC's rather than the VOC's emissions increase associated with the expansion in determining cost feasibility for the control devices.

BACT Analysis: P017 - North Side Curing Presses, consisting of 45 individual curing presses

Significant Pollutant	BACT Requirement
VOC	Emission standard of 0.000310 lb VOC/lb tire produced Emission limitation of 20.36 tons VOC/rolling, 12-month period The BACT analysis determined than no add-on controls were cost-effective for the reduction of VOC's.

The selected BACT for the North Side Curing Presses is an emission standard of 0.000310 lb VOC/lb tire produced. In addition, BACT will also include an emission limitation of 20.36 tons VOC/rolling, 12-month period. All other VOC control technologies were either determined to be technically infeasible for the process or too costly to implement, which is consistent with recent BACT determinations found in the RBLC database for tire building operations.

Using the “top-down” analysis, available control technologies were identified for this emission unit through the same process used for emissions unit P010.

After the control technologies were identified, an analysis was conducted to eliminate technically infeasible technology. In determining technical feasibility it was noted that these operations involve curing tires in excess of 15 feet in diameter and, upon completing, a weight of up to 12,000 pounds each. As a result of the height and weight of the tires, each tire must be transported using cranes and mobile lifting equipment. Because of the size of the tires and the access needed to transport materials and the tires to and from the curing area, it has been determined that it is not technically feasible to enclose the tire curing area for ventilation to a control device.

Therefore, all control cost evaluations were made based on routing the VOC laden air captured by the building ventilation system to the evaluated control device.

Once that analysis was complete, a cost analysis for each technically feasible control technology was completed. The technically feasible control technology cost analysis that were completed are as follows:

1. Regenerative Thermal Oxidizer – \$12,363/ton
2. Regenerative Catalytic Oxidizer - \$16,310/ton

It should be noted that the control costs evaluation associated with the existing North Side Curing Presses was conducted for curing presses and the tire building areas separately using the building ventilations systems located above the two distinct areas prior to installation of any of the emissions units. Based on an evaluation of the as-built equipment, the facility discovered that isolation of the tire building and curing operations is not practical. It was determined that although each operation is clustered in a separate part of the building, erection of barriers to block airflow would restrict access needed to transport tires between the two areas. Since it was determined that the tire building and curing areas cannot be isolated from each other, the facility has included combined VOC emissions and building airflow for all North Side operations (tire building and curing) to evaluate the control cost calculations for the proposed modification.

Also, in an effort to be conservative in determining cost feasibility for the control devices, the facility has applied the PTE from all North Side tire building and curing operations, rather than the emissions increase associated with the modification. In addition, calculated control costs are conservative in that they do not include the cost of ductwork needed to transfer air from the building air handling units to the control device.

Conclusions

Based upon the analysis of the permit to install application and its supporting documentation provided by Titan Tire Corporation – Bryan Plant, the Ohio EPA staff has determined that the proposed increase will comply with all applicable State and federal environmental regulations and that the requirements for BACT are satisfied. Therefore, the Ohio EPA staff recommends that a permit to install be issued to Titan Tire Corporation – Bryan Plant.



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Titan Tire Corporation of Bryan

Facility ID:	0386010003
Permit Number:	P0109768
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/19/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Titan Tire Corporation of Bryan

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Authorization

Facility ID: 0386010003
Facility Description: Tires and Inner Tubes
Application Number(s): A0044052, A0045105, A0045222
Permit Number: P0109768
Permit Description: Modification to existing tire building, curing and curing repair and finish area. Modification to add four (4) carcass/tire building areas, one (1) treading/belting operation, 25 curing presses, and increase paint usage associated with the existing curing repair and finish area.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$2,700.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/19/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Titan Tire Corporation of Bryan
927 S. Union Street
Bryan, OH 43506

of a Permit-to-Install 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109768
Permit Description: Modification to existing tire building, curing and curing repair and finish area. Modification to add four (4) carcass/tire building areas, one (1) treading/belting operation, 25 curing presses, and increase paint usage associated with the existing curing repair and finish area.

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

- Emissions Unit ID: P010**
Company Equipment ID: TB 401 & TX401
Superseded Permit Number: 03-17392
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P016**
Company Equipment ID: Repair & Finish
Superseded Permit Number: 03-17392
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P017**
Company Equipment ID: North Side Curing Presses
Superseded Permit Number:
General Permit Category and Type: Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, 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 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.

4. 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, and (ii) 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 recordkeeping 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 Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 Ohio EPA DAPC, Northwest District Office 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).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.
- c) 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:



- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- 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 recordkeeping 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 Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permitteeshall

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All



records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.



16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. P010, North Side Tire Building Area

Operations, Property and/or Equipment Description:

Existing large tire building operations consisting of 6 carcass/tire building areas and 2 treading/belting operations. Each treading/belting operation consists of one (1) belting station and two (2) treading stations.

Modified large tire building operations consisting of 10 carcass/tire building areas and 3 treading/belting operations. Each treading/belting operation consists of one (1) belting station and two (2) treading stations.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 rules 3745-31-10 through 3745-31-20	See b)(2)a.
b.	ORC 3704.04(T)(4)	See b)(2)b.
c.	OAC rule 3745-21-09 (X)(1)	None see b)(2)c.
d.	40 CFR Part 60, Subpart BBB	None see b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control technology (BACT) for the emissions unit. BACT has been determined to be the following:

i. emission standard of 6.00 lbsvolatile organic compound (VOC)/ton tire produced, as a rolling, 12-month weighted average;

ii. use of the following work practice standards that are sufficient to ensure compliance with the lb VOC/ton tire produced limit in b)(2)a.i.:

(a) store all VOC containing materials in closed containers when not in use;

(b) transport all VOC containing materials in closed containers;

(c) minimize spills of VOC containing materials; and

- (d) implement the current best practices on use of VOC containing materials;
- iii. emission limitation of 197.07 tons VOC/rolling, 12-month period for modified operations (see b)(2)e.); and
- iv. emission limitation of 109.80 tons VOC/rolling, 12-month period for current unmodified operations (see b)(2)e.).

The BACT analysis determined that no add-on controls were cost-effective for the reduction of VOC's.

- b. The "Best Available Technology" (BAT) requirement under ORC 3704.03(T) has been determined to be compliance with the BACT requirements and emission limitations established pursuant to OAC rules 3745-31-10 through 3745-31-20 [See b)(2)a.].
- c. This emissions unit is exempt from the requirements of OAC rule 3745-21-09 (X)(1) pursuant to OAC rule 3745-21-09 (X)(2)(a). Pursuant to OAC rule 3745-21-09 (A)(2)(a) any operation not associated with rubber tires with a bead diameter of less than or equal to 20 inches and a cross-sectional dimension less than or equal to 12.8 inches is exempt from the requirements of OAC rule 3745-21-09 (X)(1).
- d. This emissions unit is not applicable to the requirements of 40 CFR Part 60, Subpart BBB. The tires produced in this emissions unit do not meet the definition of a tire as contained in 40 CFR 60.541 based on bead diameter and cross section specifications. The tires produced exceed the bead diameter specification of less than or equal to 0.5 meters (18.7 inches) and the cross section dimension specification of less than or equal to 0.325 meters (12.8 inches).
- e. This PTI addresses a modification of the "large" tire building operations (North Side tire building area) located at the Titan Tire Corporation facility in Bryan, Ohio (Williams County). The modification involves an expansion to add four (4) new carcass/tire building areas, a new treading/belting operation, twenty-five (25) new curing presses, and increased operations in an existing curing repair and finishing area.

The following requirements contained in this permit shall become enforceable on the date the permittee commences operation under the modification authorized by this permit:

- i. emission limitation of 197.07 tons VOC/rolling, 12-month period (see b)(1)a., b)(2)a.iii., and f)(1)b.);
- ii. reporting requirement for exceedance of 197.07 tons VOC/rolling, 12-month period (see e)(1)b.)

Identification of the specific date modified operation commences is required by term A.13.b) within the Standard Terms and Conditions of this permit.



Effective Date: To be entered upon final issuance

All other requirements contained in this permit shall become enforceable upon the effective date contained in the final issuance of this permit.

The following requirements contained in this permit shall cease to be enforceable after the date this emissions unit commences operation under the modification authorized by this permit as indicated above:

- iii. emission limitation of 109.80 tons VOC/rolling, 12-month period (see b)(1)a.,b)(2)a.iv., and f)(1)c.);
- iv. reporting requirement for exceedance of 109.80 tons VOC/rolling, 12-month period (see e)(1)c.)

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the emissions unit:
 - a. the name and identification of each solvent material employed;
 - b. the VOC content of each solvent material employed (in pounds VOC/gallon or lbs VOC/lb solvent employed);
 - c. the number of gallons or weight (in lbs) of each solvent employed (purchase records, batch mix records, actual usage tracking, etc., may be used as a conservative approach for fulfilling this requirement);
 - d. the VOC emissions rate for each solvent material employed, in pounds per month [d)(1)b. x d)(1)c.];
 - e. the total VOC emissions for all solvent materials employed in pounds per month [sum d)1)d.];
 - f. the amount of tires produced per month, in tons;
 - g. the rolling, 12-month summation of the VOC emissions rate (in tons) for all solvents employed; and
 - h. the rolling, 12-month weighted average lbs VOC/ton tire produced calculated using the following equation:

V/T

V = the VOC emissions for all solvent materials employed in pounds during the rolling 12-month period time calculated by the following:

$$V = \sum_{M=1}^{12} \sum_{i=1}^n (V_i)(G_i)$$

where

M = the increment of the rolling 12-month period

n = the total number of solvent materials employed

V_i = VOC content in lbs/gallon or lb/lb of solvent material i

G_i = gallons or lbs of solvent material i

T = the amount of tires produced in tons during the rolling 12-month period calculated by the following:

$$T = \sum_{M=1}^{12} (T_j)$$

where:

M = the increment of the rolling 12-month period

T_j = mass (weight) of tires produced in tons

- (2) The permittee shall certify each month in a written statement that the emissions unit is employing the BACT required work practice standards specified in b)(2)a.ii.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports, in accordance with the Standard Terms and Conditions of this permit, that identify the following:
- a. any exceedances of the 6.00 lbs VOC/ton tire produced;
 - b. any exceedance of the 197.07 tons VOC/rolling, 12-month period;
 - c. any exceedance of the 109.80 tons VOC/rolling, 12-month period; and
 - d. any failure to employ the work practice standards in b)(2)a.ii.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



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:

6.00 lbs VOC/ton tire produced, as a rolling, 12-month weighted average

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

197.07 tons VOC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

109.80 tons VOC/rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



2. P016, Curing Repair and Finish Area

Operations, Property and/or Equipment Description:

Existing curing repair and finishing operations – application of cements paints, and other VOC-containing materials for repair of tires from existing large tire manufacturing operation.

Modified curing repair and finishing operations – application of cements, paints and other VOC-containing materials for repair of tires from modified large tire manufacturing operation.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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), as effective 11/30/01	See b)(2)a.
b.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)b.
c.	OAC rule 3745-31-10 through OAC rule 3745-31-20	See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit for VOC. The requirements of this rule are equivalent to the requirements established pursuant to OAC rules 3745-31-10 through 3745-31-20; therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved

SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the emission limitations and work practice standards established pursuant to OAC rule 3745-31-10 through 3745-31-20 will remain applicable after the above SIP revisions are approved by U.S. EPA.

- b. This rule paragraph applies once U.S. EPA approves December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) is less than 10 tons per year taking into consideration the BACT requirements established under OAC rules 3745-31-10 through 3745-31-20.

- c. The permittee shall employ best available control technology (BACT) for the emissions unit. BACT has been determined to be the following:

- i. Use of the following work practice standards that are sufficient to minimize VOC emissions from the tire repair and finish area:
- (a) store all VOC containing materials in closed containers when not in use;
 - (b) transport all VOC containing materials in closed containers;
 - (c) minimize spills of VOC containing materials; and
 - (d) employ water-based paints for tire coating operations whenever use of such paint does not adversely affect product quality.
- ii. emission limitation of 5.13 tons VOC/rolling, 12-month period for modified operations (see b)(2)d.); and
- iii. emission limitation of 0.84 ton VOC/rolling, 12-month period for current unmodified operations (see b)(2)d.).

The BACT analysis determined that no add-on controls were cost-effective for the reduction of VOCs.

- d. This PTI addresses a modification of the "large" tire building operations (North Side tire building area) located at the Titan Tire Corporation facility in Bryan, Ohio (Williams County). The modification involves an expansion to add four (4) new carcass/tire building areas, a new treading/belting operation*, twenty-five (25) new curing presses, and increased operations in an existing curing repair and finishing area.

The following requirements contained in this permit shall become enforceable on the date the permittee commences operation under the modification authorized by this permit:



- i. emission limitation of 5.13 tons VOC/rolling, 12-month period (see b)(1)a.,b)(2)c.ii., and f)(1)a.);
- ii. reporting requirement for exceedance of 5.13 tons VOC/rolling, 12-month period (see e)(1)a.)

Identification of the specific date modified operation commences is required by term A.13.b) within the Standard Terms and Conditions of this permit.

All other requirements contained in this permit shall become enforceable upon the effective date contained in the final issuance of this permit.

The following requirements contained in this permit shall cease to be enforceable after the date this emissions unit commences operation under the modification authorized by this permit as indicated above:

- iii. emission limitation of 0.84 ton VOC/rolling, 12-month period (see b)(1)a.,b)(2)a.iii., and f)(1)b.);
- iv. reporting requirement for exceedance of 0.84 tons VOC/rolling, 12-month period (see e)(1)b.)

- e. This emissions unit is not subject to any requirements contained in OAC rule 3745-21-09(X). OAC rule 3745-21-09(X) does not specify any applicable requirements for tire repair and finishing operations.
- f. This emissions unit is not applicable to the requirements of 40 CFR Part 60, Subpart BBB. Tire repair and finishing operations are not designated as an "affected facility" in 40 CFR Part 60.540 – Applicability and designation of affected facilities.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the emissions unit:
 - a. the name and identification of each VOC-containing material employed;
 - b. the lbs of each VOC-containing material employed (purchase records, batch mix records, actual usage tracking, etc., may be used as a conservative approach for fulfilling this requirement) ;
 - c. the VOC content of each VOC-containing material employed;
 - d. the VOC emissions rate for each VOC-containing material employed, in lbs/month [d)(1)b. x d)(1c.];



- e. the total VOC emissions from all VOC-containing materials employed, in lbs/month [sum of d)(1)d.];
 - f. the rolling, 12-month summation of the VOC emissions rate (in tons) for all VOC-containing materials employed[d)(1)e. x 1 ton/2000 lbs].
- (2) The permittee shall certify each month in a written statement that the emissions unit is employing the BACT required work practice standards specified in b)(2)c.ii.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation reports, in accordance with the Standard Terms and Conditions of this permit, that identify the following:
- a. any exceedances of the 5.13 tons VOC/rolling, 12-month period;
 - b. any exceedances of the 0.84 ton VOC/rolling, 12-month period; and
 - c. any failure to employ the work practice standards in b)(2)c.i.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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:
5.13 tons VOC/rolling, 12-month period

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(1).
 - b. Emission Limitation:
0.84 ton VOC/rolling, 12-month period

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(1).
- g) Miscellaneous Requirements
- (1) None.



3. P017, North Side Curing Presses, consisting of 45 individual curing presses

Operations, Property and/or Equipment Description:

Existing large tire curing operations consisting of 20 curing presses.

Modified large tire curing operations consisting of 45 curing presses.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-31-10 through OAC rule 3745-31-20	See b)(2)a.
b.	ORC 3704.04 (T)(4)	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control technology (BACT) for the emissions unit. BACT has been determined to be the following:

- i. emission standard of 0.000310 lbs VOC/lb tire produced, as a monthly average;
- ii. emission limitation of 20.36 tons VOC/rolling, 12-month period for modified operations (see b)(2)d.); and
- iii. emission limitation of 13.00 tons VOC/rolling, 12-month period for current unmodified operations (see b)(2)d.).

The BACT analysis determined that no add-on controls were cost-effective for the reduction of VOCs.

b. The "Best Available Technology" (BAT) requirement under ORC 3704.03(T) has been determined to be compliance with the BACT requirements and emission limitations established pursuant to OAC rules 3745-31-10 through 3745-31-20 [See b)(2)a.].

Effective Date: To be entered upon final issuance

- c. This emissions unit is not subject to any requirements contained in OAC rule 3745-21-09(X). OAC rule 3745-21-09(X) does not specify any applicable requirements for tire curing operations.
- d. This emissions unit is not applicable to the requirements of 40 CFR Part 60, Subpart BBB. Tire curing is not designated as an “affected facility” in 40 CFR Part 60.540 – Applicability and designation of affected facilities.
- e. This PTI addresses a modification of the “large” tire curing operations (North Side curing presses) located at the Titan Tire Corporation facility in Bryan, Ohio (Williams County). The modification involves an expansion to add twenty-five (25) new curing presses, four (4) new carcass/tire building areas, a new treading/belting operation*, and increased operations in an existing curing repair and finishing area.

The following requirements contained in this permit shall become enforceable on the date the permittee commences operation under the modification authorized by this permit:

- i. emission limitation of 20.36 tons VOC/rolling, 12-month period (see b)(1)a.,b)(2)a.ii., and f)(1)b.);
- ii. reporting requirement for exceedance of 20.36 tons VOC/rolling, 12-month period (see e)(1)b.)

Identification of the specific date modified operation commences is required by term A.13.b) within the Standard Terms and Conditions of this permit.

All other requirements contained in this permit shall become enforceable upon the effective date contained in the final issuance of this permit.

The following requirements contained in this permit shall cease to be enforceable after the date this emissions unit commences operation under the modification authorized by this permit as indicated above:

- iii. emission limitation of 13.00 tons VOC/rolling, 12-month period (see b)(1)a.,b)(2)a.iii., and f)(1)c.);
- iv. reporting requirement for exceedance of 13.00 tons VOC/rolling, 12-month period (see e)(1)c.)

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the emissions unit:



- a. the lbs of tire produced per month;
- b. the VOC emissions rate, in lbs/month, calculated as follows:

[d](1)a. x 0.000310 lbs VOC/lb tire produced (conservatively applied as a lb/ton tire emissions factor)*]

*emission factor from AP-42 section 4.12 (draft 2008)
- c. the rolling, 12-month summation of the VOC emissions rate (in tons).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports, in accordance with the Standard Terms and Conditions of this permit, that identify the following:
 - a. any exceedances of the 0.000310 lb VOC/lb tire produced;
 - b. any exceedance of the 20.36 tons VOC/rolling, 12-month period; and
 - c. any exceedance of the 13.00 tons VOC/rolling 12-month period.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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:
0.000310 lb VOC/lb tire produced

Applicable Compliance Method:
Emission limitation is based on an emission factor from AP-42, section 4.12 (draft 2008). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.
 - b. Emission Limitation:
20.36 tons VOC/rolling, 12-month period

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(1).
 - c. Emission Limitation:
13.00 tons VOC/rolling, 12-month period



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.