Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/1/2012

Certified Mail

Facility ID: 0387020045
Permit Number: P0104546
County: Wood

Mark Vascik
Cooper Standard Automotive, LLC
1175 N Main St
Bowling Green, OH 43402

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 8/9/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0387020045
Facility Name:	Cooper Standard Automotive, LLC
Facility Description:	Rubber Seals Manufacturing Plant.
Facility Address:	1175 North Main Street Bowling Green, OH 43402 Wood County
Permit:	P0104546, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the TheSentenil-Tribune on 08/13/2012. The comment period ended on 09/12/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

1. Company Comment:
The company asks that the final Title V not be issued until all applicable changes are completed.

Agency Response:
Such is standard agency practice, for final Title V permit issuance.

2. Company Comment:
The company disagrees with the requirement in the Draft permit under emissions unit P079, (EU-FL#3), “section f)” Testing Requirements. The company does not feel that the additional testing is needed due to the stack test done in March 2012 as described in the May 2012 report that was submitted to the OEPA.

Agency Response:
This requirement is a ‘carry-over’ of testing requirements from Permit to Install (PTI) P0105587 issued October 13, 2011, and as such, is not an ‘additional’ testing requirement. This language will be removed because the compliance demonstration has been resolved as per the stack test letter dated September 24, 2012.

3. Company Comment:
The company would like to request overall rubber emissions be reported annually per emission unit and not monthly per emission unit.

Agency Response:
The permit contains only annual deviation reports. The permit requires monthly records be kept for rubber throughput and associated emissions calculation. Monthly records are normally the least stringent frequency included in a permit in this context; any further 'relaxation' would need to be applied for in a PTI modification.

4. Company Comment:
The company objects to any additional testing based on actual emission of the plant being less than ten tons a year.

Agency Response:
See response to Comment 2.

5. Company Comment:
The company is prepared to submit a PTI for grouping of the similar extrusion processes to allow for flexibility and the opportunity to bring additional business into the facility.

Agency Response:
In the past week, several phone and email attempts were made to contact the company, including the plant itself in Bowling Green and the company's corporate office, and no response has been received. The agency will move the permit to the next issuance stage, i.e. Preliminary Proposed, and the company will have an additional 14-day comment period.

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Cooper Standard Automotive, LLC

Facility ID:	0387020045
Permit Number:	P0104546
Permit Type:	Renewal
Issued:	10/1/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Cooper Standard Automotive, LLC

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Authorization

Facility ID:	0387020045
Facility Description:	Rubber Seals Manufacturing Plant.
Application Number(s):	A0037011, A0043801
Permit Number:	P0104546
Permit Description:	Title V renewal for the Rubber Seals Manufacturing Plant. This facility manufactures rubber seals for the automotive industry, including primarily coating operations and extruders. The main air pollutants include volatile organic compounds, and also carbon disulfide.
Permit Type:	Renewal
Issue Date:	10/1/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087908

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Cooper Standard Automotive, LLC
1175 North Main Street
Bowling Green, OH 43402

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall

be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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 declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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, in accordance with Standard Term and Condition A.11 below. 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(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 paragraph (E) of OAC rule 3745-77-03.

(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.

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:

(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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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.

2. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

   The following emissions units in this permit are subject to the aforementioned requirements: B002 and B003.

   [Authority for term: OAC rule 3745-77-07(A)(13), 40 CFR Part 63, Subpart DDDDD]

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and/or 40 CFR 63 Subpart DDDDD.

   B002 - N.G. BOILER #2 (6.0 mmBtu/hr) For Cascade Line
   B003 - N.G. BOILER #3 (6.0 mmBtu/hr) For Cascade Line
   P081 - Abrasive Blasting Units (For Molds in Finishing, equipment in Maintenance)
   P082 - Injection & Transfer Presses
   R032 - Finishing Operations (Coating, Ink, Adhesive, Lube Operations)
   R033 - ZEP Part Washer Units (Tow Motor Shop and Maintenance)
   R034 - Miscellaneous Line Operations (Mastic, In-Line Dotters, Slip Coat, Lube)

   (Authority for term: OAC rule 3745-77-07(A)(13))

C. Emissions Unit Terms and Conditions

1. P071, PL3

Operations, Property and/or Equipment Description:

Roll forming - Plastic Line #3

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 3745-31-05(A)(3), as effective 11/30/01 (PTI P0109806 issued April 16, 2012)	1.65 pounds (lbs) volatile organic compounds (VOC) /hr; 7.23 tons VOC /year See b)(2)a.
b.	OAC 3745-31-05(A)(3, as effective 12/01/06	See b)(2)b.

(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. 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 pollutants 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/controls measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compounds (VOC) from this air

contaminant source since the uncontrolled potential to emit for emissions of VOC is less than 10 tons per year.

c. The hourlyVOC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

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 Limitations:
1.65 lbs VOC /hr; 7.23 tons VOC /year

Applicable Compliance Method:
The hourly VOC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on the maximum VOC content of 6.33 pounds per gallon and a maximum usage rate of 0.26 gallons per hour.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI P0109806]

g) Miscellaneous Requirements

(1) None.

2. P072, EU-CC#1

Operations, Property and/or Equipment Description:

Cascade Line #1

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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 (PTI P0105587 issued October 13, 2011)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3, as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(F) (PTI P0105587 issued October 13, 2011)	0.30 pound (lb) volatile organic compounds (VOC)/hr; 1.31 tons VOC /year from coating operations 1.07 lbsVOC /hr; 4.70 tons VOC /year from rubber curing and extruding operations* See b)(2)c. and c)(1)
d.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

* Extruding operations are considered negligible for VOC emissions in this emissions unit based on AP-42 Section 4.12 issued draft in November 2008.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 0.50 pound per gallon.

b. The maximum annual coating usage in this emissions unit shall not exceed 5256 gallons.

c. The maximum annual production rate from this emissions unit shall not exceed 5694 tons of rubber.

[OAC 3745-77-07(A)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.]; and

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December].

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials

processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

Toxic Contaminant: Acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 78.9
MAGLC (ug/m3): 1170

Toxic Contaminant: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 0.84
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 112
MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).
[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.
[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 5256 gallons;

b. the annual rubber production limitation of 5694 tons; and

c. any exceedance of the pound of VOC per gallon density limitation.
[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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. <u>Emission Limitation:</u>
0.30 lb VOC/hr,1.31 tons VOC/year - from coating operations

<u>Applicable Compliance Method:</u>
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000

lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:
1.07 lbs VOC/hr, 4.70 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

g) Miscellaneous Requirements

(1) None.

3. P074, EU-DD#4

Operations, Property and/or Equipment Description:

Dual Durometer Line #4

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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 (PTI P0105587 issued October 13, 2011)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(F) (PTI P0105587 issued October 13, 2011)	0.20 pound (lb) volatile organic compounds (VOC)/hr; 0.87 tons VOC /year from coating operations 1.07 lbs of VOC/hr; 4.70 tons VOC /year from rubber curing and extruding operations* See b)(2)c. and c)(1)
d.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

* Extruding operations are considered negligible for VOC emissions in this emissions unit based on AP-42 Section 4.12 issued draft in November 2008.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 0.33 pound per gallon.

b. The maximum annual coating usage in this emissions unit shall not exceed 5256 gallons.

c. The maximum annual production rate from this emissions unit shall not exceed 5694 tons of rubber.

[OAC 3745-77-07(A)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.]; and

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December].

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials

processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

Toxic Contaminant: Acetophenone
TLV (mg/m3): 49
Maximum Hourly Emission Rate (lbs/hr): 0.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 78.9
MAGLC (ug/m3): 1170

Toxic Contaminant: Carbon Disulfide
TLV (mg/m3): 31
Maximum Hourly Emission Rate (lbs/hr): 0.84
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 112
MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).
[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.
[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 5256 gallons;

b. the annual rubber production limitation of 5694 tons; and

c. any exceedance of the pound of VOC per gallon density limitation.
[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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. <u>Emission Limitations:</u>
0.20 lb VOC/hr, 0.87 ton VOC/year - from coating operations

<u>Applicable Compliance Method:</u>
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000

lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:
1.07 lbs VOC/hr, 4.70 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

g) Miscellaneous Requirements

(1) None.

4. P078, EU-FL#2

Operations, Property and/or Equipment Description:

Flock Line #2

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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 (PTI P0105587 issued October 13, 2011)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(F) (PTI P0105587 issued October 13, 2011)	2.05 pounds (lbs)volatile organic compounds (VOC)/hr; 8.98 tons VOC /year from coating operations 0.91 lbVOC /hr; 3.97 tons VOC /year from rubber curing and extruding operations* See b)(2)c. and c)(1)
d.	OAC rule 3745-21-07(M)(3)(e)	See b)(2)d.
e.	OAC rule 3745-21-07(G)(9)(g)	See b)(2)e.
f.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

* Extruding operations are considered negligible for VOC emissions in this emissions unit based on AP-42 Section 4.12 issued draft in November 2008.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit unless the VOC content of the adhesive or other coating employed within this flock line does not exceed 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied).

e. The emission limitations established pursuant to this rule have been integrated into OAC rule 3745-21-09(M)(3)(e).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 2.60 pound per gallon.

b. The maximum annual coating usage in this emissions unit shall not exceed 10,862 gallons.

c. The maximum annual production rate from this emissions unit shall not exceed 4818 tons of rubber.

[OAC 3745-77-07(C)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.];

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December]; and

j. the VOC content for each coating employed, excluding water and exempt compounds, as applied.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was

performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   $$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

   Toxic Contaminant: Acetophenone
   TLV (mg/m3): 49
   Maximum Hourly Emission Rate (lbs/hr): 0.23
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 66.8
   MAGLC (ug/m3): 1170

   Toxic Contaminant: Carbon Disulfide
   TLV (mg/m3): 31
   Maximum Hourly Emission Rate (lbs/hr): 0.71

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94
MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).
[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 10,862 gallons;

b. the annual rubber production limitation of 4818 tons; and

c. any exceedance of the pound of VOC per gallon density limitation.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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 Limitations:
0.91 lb VOC/hr, 3.97 ton VOC/year - from coating operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:
2.05 lbs VOC/hr, 8.98 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI P0105587]

c. Emission Limitation:
2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied)

Applicable Compliance Method:
Compliance shall be demonstrated through the recordkeeping requirements in section e)(1)j.
[OAC 3745-77-07(C)(1)]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

g) Miscellaneous Requirements

(1) None.

5. P079, EU-FL#3

Operations, Property and/or Equipment Description:

Flock Line #3

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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(F) (PTI P0105587 issued October 13, 2011)	2.54 pounds (lbs)volatile organic compounds (VOC)/hr; 11.1 tons VOC /year from coating operations 1.44 lbsVOC /hr; 6.32 tons VOC /year from rubber curing and extruding operations* See b)(2)c. and c)(1)
b.	OAC rule 3745-21-07(M)(3)(e)	See b)(2)d.
c.	OAC rule 3745-21-07(G)(9)(g)	See b)(2)e.
d.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

* Extruding operations are considered negligible for VOC emissions in this emissions unit based on AP-42 Section 4.12 issued draft in November 2008.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit unless the VOC content of the adhesive or other coating employed within this flock line does not exceed 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied).

e. The emission limitations established pursuant to this rule have been integrated into OAC rule 3745-21-09(M)(3)(e).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 2.60 pound per gallon.

b. The maximum annual coating usage in this emissions unit shall not exceed 9198 gallons.

c. The maximum annual production rate from this emissions unit shall not exceed 7665 tons of rubber.

[OAC 3745-77-07(A)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.];

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December]; and

j. the VOC content for each coating employed, excluding water and exempt compounds, as applied.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA

guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

   Toxic Contaminant: Acetophenone
   TLV (mg/m3): 49
   Maximum Hourly Emission Rate (lbs/hr): 0.37
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 106
   MAGLC (ug/m3): 1170

   Toxic Contaminant: Carbon Disulfide
   TLV (mg/m3): 31
   Maximum Hourly Emission Rate (lbs/hr): 1.13
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 150
   MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum

acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).
[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 9198 gallons;

b. the annual rubber production limitation of 7665 tons; and

c. any exceedance of the pound of VOC per gallon density limitation.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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. <u>Emission Limitations:</u>
2.54 lbs VOC/hr, 11.1 ton VOC/year - from coating operations

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:
1.44 lbs VOC/hr, 6.32 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI P0105587]

c. Emission Limitation:
2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied)

Applicable Compliance Method:
Compliance shall be demonstrated through the recordkeeping requirements in section e)(1)j.
[OAC 3745-77-07(C)(1)]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

g) Miscellaneous Requirements

(1) None.

6. P080, EU-FL#4

Operations, Property and/or Equipment Description:

Flock Line #4

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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(F) (PTI P0105587 issued October 13, 2011)	1.69 pounds (lbs) volatile organic compounds (VOC)/hr; 7.40 tons VOC /year from coating operations 1.44 lbs VOC /hr; 6.32 tons VOC /year from rubber curing and extruding operations* See b)(2)c. and c)(1)
b.	OAC rule 3745-21-07(M)(3)(e)	See b)(2)d.
c.	OAC rule 3745-21-07(G)(9)(g)	See b)(2)e.
d.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

* Extruding operations are considered negligible for VOC emissions in this emissions unit based on AP-42 Section 4.12 issued draft in November 2008.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from this emissions unit unless the VOC content of the adhesive or other coating employed within this flock line does not exceed 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied).

e. The emission limitations established pursuant to this rule have been integrated into OAC rule 3745-21-09(M)(3)(e).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 2.60 pound per gallon.

b. The maximum annual coating usage in this emissions unit shall not exceed 5694 gallons.

c. The maximum annual production rate from this emissions unit shall not exceed 7665 tons of rubber.

[OAC 3745-77-07(A)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.];

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December]; and

j. the VOC content for each coating employed, excluding water and exempt compounds, as applied.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA

guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

   Toxic Contaminant: Acetophenone
   TLV (mg/m3): 49
   Maximum Hourly Emission Rate (lbs/hr): 0.37
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 106
   MAGLC (ug/m3): 1170

   Toxic Contaminant: Carbon Disulfide
   TLV (mg/m3): 31
   Maximum Hourly Emission Rate (lbs/hr): 1.13
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 150
   MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum

acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).
[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 5694 gallons;

b. the annual rubber production limitation of 7665 tons; and

c. any exceedance of the pound of VOC per gallon density limitation.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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. <u>Emission Limitations:</u>
1.69 lbs VOC/hr, 7.40 ton VOC/year - from coating operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:
1.44 lbs VOC/hr, 6.32 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI P0105587]

c. Emission Limitation:
2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied)

Applicable Compliance Method:
Compliance shall be demonstrated through the recordkeeping requirements in section e)(1)j.
[OAC 3745-77-07(C)(1)]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Group A: durometer #3,#8: P073,P077,

EU ID	Operations, Property and/or Equipment Description
P073	Dual Durometer Line #3
P077	Dual Durometer Line #8

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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 (PTI P0105587 issued October 13, 2011)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(F) (PTI P0105587 issued October 13, 2011)	0.20 pound (lb) volatile organic compounds (VOC) /hr; 0.87 tons VOC /year from coating operations (for each emissions unit) 1.44lbs VOC/hr; 6.32 tons VOC /year from rubber curing and extruding operations* (for each emissions unit) See b)(2)c. and c)(1)
d.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

* Extruding operations are considered negligible for VOC emissions in this emissions unit based on AP-42 Section 4.12 issued draft in November 2008.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under

OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 0.33 pound per gallon.

b. The maximum annual coating usage in each emissions unit shall not exceed 5256 gallons.

c. The maximum annual production rate from each emissions unit shall not exceed 7665 tons of rubber.

[OAC 3745-77-07(A)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.]; and

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December].

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

   Toxic Contaminant: Acetophenone
   TLV (mg/m3): 49 (both lines)
   Maximum Hourly Emission Rate (lbs/hr): 0.37 (P073); 0.28 (P077)
   Predicted 1-Hour Maximum Ground-Level Conc. (ug/m3): 106 (P073); 79 (P077)
   MAGLC (ug/m3): 1170 (both lines)

   Toxic Contaminant: Carbon Disulfide
   TLV (mg/m3): 31 (both lines)
   Maximum Hourly Emission Rate (lbs/hr): 1.13 (P073); 0.84 (P077)
   Predicted 1-Hour Maximum Ground-Level Conc. (ug/m3): 150 (P073); 79 (P077)
   MAGLC (ug/m3): 738 (both lines)

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially

and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 5256 gallons (for each emissions unit);

b. the annual rubber production limitation of 7665 tons (for each emissions unit); and

c. any exceedance of the pound of VOC per gallon density limitation.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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. <u>Emission Limitations:</u>(for each emissions unit)
0.20 lb VOC/hr, 0.87 ton VOC/year - from coating operations

<u>Applicable Compliance Method:</u>
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:(for each emissions unit)
1.44 lbs VOC/hr, 6.32 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -Group B: durometer #6, #7: P075,P076,

EU ID	Operations, Property and/or Equipment Description
P075	Dual Durometer Line #6
P076	Dual Durometer Line #7

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) d)(2), d)(3), d)(4), d)(5), and e)(2).

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 (PTI P0105587 issued October 13, 2011)	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(F) (PTI P0105587 issued October 13, 2011)	0.78 pound (lb) volatile organic compounds (VOC) /hr; 3.42 tons VOC /year from coating operations (for each emissions unit) 1.07 lbs VOC /hr; 4.70 tons VOC /year from rubber curing and extruding operations* (for each emissions unit) See b)(2)c. and c)(1)
d.	OAC rule 3745-114-01 and ORC 3704.04(F)	See d)(2) through d)(5) and e)(2)

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]. The voluntary restriction was intentionally established to be consistent with the BAT requirements under

OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restriction; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)b.].

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. 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 pollutants 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 requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

b. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the volatile organic compound (VOC) emitted from thisemissions unit since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c. This permit establishes the legally and practically enforceable emission limitation(s) in b)(1)c above, for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitation(s) is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on the restrictions contained in c)(1).

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE [See b)(2)c.]:

a. The VOC content of the coating applied shall not exceed 0.58 pound per gallon.

b. The maximum annual coating usage in each emissions unit shall not exceed 14,016 gallons.

c. The maximum annual production rate from each emissions unit shall not exceed 5694 tons of rubber.

[OAC 3745-77-07(A)(1) and PTI P0105587]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with the operational restrictions, the permittee shall collect and record the following information each month in this emissions unit:

a. the quantity of rubber cured and extruded, in tons;

b. the VOC emission rate, in tons, from rubber curing and extruding operations;

c. the cumulative sum of VOC emissions for the calendar year from rubber curing and extruding operations [sum of d)(1)b. for each month to date from January to December];

d. the company identification for each coating material employed;

e. the number of gallons of each coating material employed;

f. the VOC content for each coating material employed, in pounds per gallon;

g. the VOC emission rate for each coating material employed [d)(1)e. x d)(1)f.];

h. the total VOC emission rate for all coating materials employed [sum of d)(1)g.]; and

i. the annual, year to date, VOC emissions from all coating materials employed, in tons per year [sum of d)(1)h. for each month to date from January to December].

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permit-to-install (PTI) application for this emissions unit, P072, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminants:

   Toxic Contaminant: Acetophenone
   TLV (mg/m3): 49
   Maximum Hourly Emission Rate (lbs/hr): 0.28
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 79
   MAGLC (ug/m3): 1170

   Toxic Contaminant: Carbon Disulfide
   TLV (mg/m3): 31
   Maximum Hourly Emission Rate (lbs/hr): 0.84
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 112
   MAGLC (ug/m3): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from emissions unit P072, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[PTI P0105587]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
[PTI P0105587]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially

and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[PTI P0105587]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[PTI P0105587]

e) Reporting Requirements

(1) The permittee shall submit annual deviation (excursion) reports which identify any exceedance of the following:

a. the annual coating usage rate of 14,016 gallons (for each emissions unit);

b. the annual rubber production limitation of 5694 tons (for each emissions unit); and

c. any exceedance of the pound of VOC per gallon density limitation.

[OAC 3745-77-07(C)(1) and PTI P0105587]

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
[PTI P0105587]

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. <u>Emission Limitations:</u>(for each emissions unit)
0.78 lb VOC/hr, 3.42 ton VOC/year - from coating operations

<u>Applicable Compliance Method:</u>
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emissions rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

b. Emission Limitations:(for each emissions unit)
1.07 lbs VOC/hr, 4.70 tons VOC/year - from rubber curing and extruding operations

Applicable Compliance Method:
Compliance with the hourly emissions limitation shall be demonstrated through the operating, monitoring, recordkeeping and reporting requirements established in sections c)(1), d)(1) and e)(1) of this permit.

The annual limitation was developed by multiplying the hourly emissions rate by a maximum annual operating schedule of 8760 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI P0105587]

g) Miscellaneous Requirements

(1) None.