



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

11/19/2012

Tate Tyson
Bridgestone APM Co.- AVD Plant
PO Box 450
235 Commerce Way
Upper Sandusky, OH 43351

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0388010047
Permit Number: P0109918
Permit Type: Initial Installation
County: Wyandot

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Bridgestone APM Co.- AVD Plant

Facility ID:	0388010047
Permit Number:	P0109918
Permit Type:	Initial Installation
Issued:	11/19/2012
Effective:	11/19/2012



Division of Air Pollution Control
Permit-to-Install
for
Bridgestone APM Co.- AVD Plant

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Final Permit-to-Install
Bridgestone APM Co.- AVD Plant
Permit Number: P0109918
Facility ID: 0388010047
Effective Date: 11/19/2012

Authorization

Facility ID: 0388010047
Facility Description: Bonded rubber to metal anti-vibration parts for the automotive industry
Application Number(s): A0044031, A0044814, A0045740
Permit Number: P0109918
Permit Description: Installation of a rubber parts coating line (Honda Bondline #5).
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 11/19/2012
Effective Date: 11/19/2012

This document constitutes issuance to:

Bridgestone APM Co.- AVD Plant
235 Commerce Way
Upper Sandusky, OH 43351

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

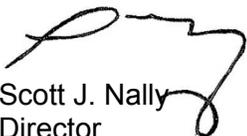
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install
Bridgestone APM Co.- AVD Plant
Permit Number: P0109918
Facility ID: 0388010047
Effective Date: 11/19/2012

Authorization (continued)

Permit Number: P0109918

Permit Description: Installation of a rubber parts coating line (Honda Bondline #5).

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

Emissions Unit ID:	R005
Company Equipment ID:	Honda Bondline #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Bridgestone APM Co.- AVD Plant
Permit Number: P0109918
Facility ID: 0388010047
Effective Date: 11/19/2012

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the 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.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

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

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

14. Public Disclosure

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



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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
Bridgestone APM Co.- AVD Plant
Permit Number: P0109918
Facility ID: 0388010047
Effective Date: 11/19/2012

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Bridgestone APM Co.- AVD Plant
Permit Number: P0109918
Facility ID: 0388010047
Effective Date: 11/19/2012

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.



Final Permit-to-Install
Bridgestone APM Co.- AVD Plant
Permit Number: P0109918
Facility ID: 0388010047
Effective Date: 11/19/2012

C. Emissions Unit Terms and Conditions



1. R005, Honda Bondline #5

Operations, Property and/or Equipment Description:

Honda Bondline #5 vented to a regenerative thermal oxidizer (RTO)

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) b)(1)e.; d)(10); d)(11); d)(12); d)(13) and e)(2)g.

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)	Emissions of volatile organic compounds (VOC) shall not exceed 0.73 pound per pound solids (lb VOC/lb solids) from coating operations (see b)(2)a.) Cleanup operations – work practice standards (see b)(2)a. and c)(3))
b.	ORC 3704.03(T)	See b)(2)b.
c.	OAC rule 3745-21-07(M)	See b)(2)c.
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
e.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(10) through d)(13), and e)(2)g.

(2) Additional Terms and Conditions

a. This permit establishes a legally and practically enforceable emission limitation for the purpose of limiting potential to emit (PTE) for VOC. The legally and practically enforceable emission limitation is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on a VOC emission standard reflecting the application of control and/or the use of low VOC containing materials.

Emissions unit R005 involves the coating of rubber parts (bushings) using a 3-step process. Step 1 and step 2 involve the application of 100% VOC solvent to clean parts and promote adhesion of a top coat which is applied in the 3rd step. VOC emissions generated during all 3 steps of the process are vented to a



regenerative thermal oxidizer (RTO) control system. A capture and destruction efficiency achievable from the use of an RTO was applied to the VOC contents and maximum application rates of materials employed in all 3 steps of the coating process to establish an emission standard of:

0.73 lb VOC/lb solids from coating operations

The potential to emit for VOC from emissions unit is based on the lb VOC/lb solids emission standard and results in a potential of 10.5 tons per year and was determined by the following calculation:

0.73 lb VOC ⁽¹⁾	3.30 lbs solids ⁽²⁾	8760 hours ⁽³⁾	1 ton ⁽⁴⁾
lb solids	hour	year	2000 lbs

where:

- (1) enforceable VOC emission standard
- (2) maximum solids application rate
- (3) maximum annual operating schedule
- (4) conversion factor

Operations in emissions unit R005 also involve the use of VOC containing material for cleanup. Cleanup operations generate a negligible level of VOC emissions and therefore, a VOC emission limitation has not been established. Cleanup operations are conducted within the booth enclosure and mainly involve the cleaning of coating application equipment through purging. The requirement to apply work practice standards (see c)(3)) will ensure cleanup operations only generate negligible emissions.

- b. Best Available Technology (BAT) requirements under ORC 3704.03(T) has been determined to be compliance with the voluntary restriction established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].
- c. This emissions unit meets the conditions contained in OAC rule 3745-21-07(M)(3)(c)(iii), which are more stringent than the requirements of OAC rule 3745-21-07(M)(2). Therefore, OAC rules 3745-21-07(M)(3)(a) and 3745-21-07(M)(3)(b) are not considered applicable.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this/these emissions unit(s) is/are in operation and shall maintain the dry particulate filter in accordance with its established procedures. Modifications deemed necessary to ensure proper operation of the system by the permittee's engineering and/or maintenance departments shall be incorporated into its established procedures.



- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, whenever it is determined that the control device is not operating in accordance with the established procedures.
- (3) The permittee shall employ the following work practice standards for cleanup operations for this emissions unit:
 - a. all cleanup operations shall be performed within the spray booth enclosure system and may only be conducted when the spray booth is being vented to the RTO serving this emissions unit;
 - b. the VOC containing material employed shall be reclaimed and placed into containers with tight fitting lids before they are transported to the reclaim area; and
 - c. all reclaimed VOC containing material shall be stored in closed containers except during the addition and/or removal of material.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall certify each month, in writing, that all cleanup operations are in compliance with the operational restrictions specified in c)(3).
 - (2) The permittee shall collect and record the following information each day for emissions unit R005:
 - a. the name and identification number of each coating and VOC containing pretreatment material applied;
 - b. for each coating, applied:
 - i. the calculation for the VOC content in pounds of VOC per pound of coating solids and the record of each variable for each coating applied:
$$C_{VOC} = W_{VOC} / W_s$$

where:

$$C_{VOC} = \text{VOC content, in pounds of VOC per pound of solids}$$
$$W_{VOC} = \text{weight fraction of VOC in coating, in pound of VOC per pound of coating}$$
$$W_s = \text{weight fraction of solids in coating, in pound of solids per pound of coating}$$
 - ii. the liquid volume employed each day, in gallons (L_c)
 - c. for each VOC containing pretreatment material applied:
 - i. the VOC content, in pounds per gallons (S_{VOC});



- ii. the liquid volume of employed each day, in gallons (L_S);
- d. the daily volume-weighted average VOC content in pounds of VOC per pound of solids of all the coatings and VOC containing pretreatment material applied, calculated as follows:

n n

$$(C_{VOC})_A = \sum_{i=1}^n ((C_{VOC,i})(L_{Ci})(V_{Si}) + (S_{VOC,i})(L_{Si})) / \sum_{i=1}^n (L_{Ci}) (V_{Si})$$

where:

$(C_{VOC})_A$ = daily volume-weighted average VOC content (in pounds of VOC per pound of solids, as applied)

C_{VOC} = VOC content, in pounds of VOC per pound of coating solids

L_C = liquid volume, in gallons, of each coating employed during the day

V_S = volume fraction of solids in coating, in gallon of solids per gallon of coating

S_{VOC} = VOC content in pounds of VOC per gallon of VOC containing pretreatment material

L_S = volume of each VOC containing pretreatment solvent employed

i = subscript denoting a specific coating/VOC containing pretreatment material employed during the day

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during the day.

- e. the daily controlled VOC emission rate, in pounds of VOC per pound of coating solids applied, calculated as follows:

$$(CC_{VOC}) (1 - CE)$$

Where:

CC_{VOC} = daily control VOC emission rate, in pounds of VOC per pound of coating solids applied

CE = the overall control efficiency, as determined for the thermal oxidizer during the most recent emission test

- (3) The volume of coatings and VOC containing pretreatment material employed each day shall be determined by the amount dispensed from the facility's central paint mix room. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat



exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and
- b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

(4) Whenever the monitored combustion temperature within the RTO deviates from the operating temperature value specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment in conformance with the acceptable temperature value specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and



- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

The operating temperature requirement is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northwest District Office. The permittee may request revisions to the permitted temperature value based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the operating temperature value will not constitute a relaxation of the monitoring requirements and may be incorporated into this permit by means of minor permit modification.

- (5) The permittee shall maintain documentation of its established procedures for the dry filtration system. Any modifications deemed necessary by the permittee shall also be documented. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permittee shall conduct scheduled periodic inspections of the dry particulate filter to determine whether it is operating in accordance with its established procedures. The permittee shall maintain a copy of the scheduled maintenance frequency and it shall be made available to the Ohio EPA upon request.
- (7) In addition to its scheduled periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (9) The permittee shall maintain records that document all time periods when the dry filtration system was either not in service when the emissions units were in operation or not operated in accordance with its established procedures. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (10) The permit-to-install application for this emissions unit (R005) was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s) 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 result(s) 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(s) emitted from the emissions unit(s), (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., "24" hours per day and "7" 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 contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m³): 188.4

Maximum Hourly Emission Rate (lbs/hr): 0.43

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 14.66

MAGLC (ug/m³): 4486

The permittee, has demonstrated that emissions of toluene, from emissions unit R005, 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).

- (11) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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(s) or its/their 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.



- (12) 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(s) 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(s) or the materials applied.
- (13) 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.
- e) Reporting Requirements
- (1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from R005. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
 - c. each incident of deviation described in e)(2)a. or e)(2)b. where a prompt investigation was not conducted;



- d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective action(s).;
- f. any daily record showing that the dry particulate filter system was not in service or not operated according to its established procedures when the emissions units were in operation; and
- g. 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; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.
- h. any deviation of the operational restrictions for cleanup operations specified in c)(3).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. Emissions Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 0.73 pound per pound solids (lb VOC/lb solids) from coating operations

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping specified in section d)(2).



If required, emissions testing shall be conducted in accordance with the following methods to demonstrate the overall control efficiency achieved by the thermal oxidizer control system:

- i. Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;
 - ii. Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;
 - iii. Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;
 - iv. Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;
 - v. Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of the thermal oxidizer, simultaneously, using:
 - (a) Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm
 - (b) Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and
 - vi. Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.
- g) Miscellaneous Requirements
- (1) None.