



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

12/27/2012

Mark Vascik
Cooper Standard Automotive, LLC
308 Fedelon Trail
Goldsboro, NC 27530

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0387020045
Permit Number: P0111501
Permit Type: OAC Chapter 3745-31 Modification
County: Wood

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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

Certified Mail

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Cooper Standard Automotive operates a rubber seals manufacturing facility for the automotive industry in Bowling Green, Ohio.

3. Facility Emissions and Attainment Status: Cooper Standard Automotive wishes to establish Potential to Emit (PTE) levels of volatile organic compounds (VOCs) through the federal enforcement authority under OAC 3745-31-05(D) through this permit action, for certain emissions units. Wood County is in attainment for all criteria pollutants. (See also Paragraph 6 below for facility-wide PTE information.)

4. Source Emissions: The PTE for VOC established under this permit under 31-05(D) will be 42.2 tons per year (established on a rolling 12-month basis). This figure results from 10.8 tons for coating operations and 31.4 tons for rubber curing operations, for emissions units P072 through P077 (the 'dual durometer /cascade' lines) combined.

5. Conclusion: A synthetic minor restriction of 42.2 tons VOC per year total for P072 through P077 will effectively limit the potential emissions for the facility to be less than Prevention of Significant Deterioration (PSD) major source threshold of 250 tons VOC.

6. Please provide additional notes or comments as necessary:

Also included in this permit action is an administrative modification for the 'flock' lines (emissions units P078 through P080). A legally and practically enforceable limit under OAC 3745-31-05(F), of 56.6 tons VOC, is established to ensure authoritatively enforceable PTE levels for these emissions units also. This permit action, in its entirety, covers the PTE for VOC for all 'significant' emissions units for the facility in the Title V operating permit, except for P071.

7. Total Permit Allowable Emissions Summary (for informational purposes only) for P072 through P077:

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	42.2

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Cooper Standard Automotive, LLC

Issue Date: 12/27/2012

Permit Number: P0111501

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Chapter 31 permit modification to increase the short-term limit for emissions units P072 through P077 (durometer lines) and further consolidation of emissions unit groups (durometer and flock lines, emissions units P078 through P080) and their associated emissions limits.

Facility ID: 0387020045

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

Facility Description: All Other Rubber Product Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Cooper Standard Automotive, LLC

Facility ID:	0387020045
Permit Number:	P0111501
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/27/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Cooper Standard Automotive, LLC

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Draft Permit-to-Install
Cooper Standard Automotive, LLC
Permit Number: P0111501
Facility ID: 0387020045
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0387020045
Facility Description: Rubber Seals Manufacturing Plant.
Application Number(s): A0045838
Permit Number: P0111501
Permit Description: Chapter 31 permit modification to increase the short-term limit for emissions units P072 through P077 (durometer lines) and further consolidation of emissions unit groups (durometer and flock lines, emissions units P078 through P080) and their associated emissions limits.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$4,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/27/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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



Authorization (continued)

Permit Number: P0111501

Permit Description: Chapter 31 permit modification to increase the short-term limit for emissions units P072 through P077 (durometer lines) and further consolidation of emissions unit groups (durometer and flock lines, emissions units P078 through P080) and their associated emissions limits.

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

Group Name: Group A -Durometer/Cascade Lines

Emissions Unit ID:	P072
Company Equipment ID:	EU-CC#1
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P073
Company Equipment ID:	EU-DD#3
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P074
Company Equipment ID:	EU-DD#4
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P075
Company Equipment ID:	EU-DD#6
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P076
Company Equipment ID:	EU-DD#7
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P077
Company Equipment ID:	EU-DD#8
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable

Group Name: Group B - Cascade Lines

Emissions Unit ID:	P078
Company Equipment ID:	EU-FL#2
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P079
Company Equipment ID:	EU-FL#3
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P080
Company Equipment ID:	EU-FL#4
Superseded Permit Number:	P0105587
General Permit Category andType:	Not Applicable



Draft Permit-to-Install
Cooper Standard Automotive, LLC
Permit Number: P0111501
Facility ID: 0387020045
Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install
Cooper Standard Automotive, LLC
Permit Number: P0111501
Facility ID: 0387020045
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Cooper Standard Automotive, LLC

Permit Number: P0111501

Facility ID: 0387020045

Effective Date: To be entered upon final issuance

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



Draft Permit-to-Install
Cooper Standard Automotive, LLC
Permit Number: P0111501
Facility ID: 0387020045
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Group A -Durometer/Cascade Lines: P072,P073,P074,P075,P076,P077,

EU ID	Operations, Property and/or Equipment Description
P072	Cascade Line #1
P073	Dual Durometer Line #3
P074	Dual Durometer Line #4
P075	Dual Durometer Line #6
P076	Dual Durometer Line #7
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) b)(1)d, 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(D)	<u>Coating operations:</u> 1.90 pounds volatile organic compounds (VOC) per gallon of coating, as applied 10.8 tons VOC per rolling 12-month period, from coating operations, for emissions units P072 through P077, combined <u>Rubber curing operations:</u> 1.65 lbs VOC per ton of rubber cured 31.4 tons VOC per rolling 12-month period, from rubber curing operations, for emissions units P072 through P077, combined See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-114-01 ORC 3704.04(F)	See d)(2) through d)(5), and e)(2).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

- i. The VOC content of the coating shall not exceed 1.90 pounds per gallon, as applied.
- ii. The VOC emissions from rubber curing shall not exceed 1.65 pounds per ton of rubber cured.
- iii. VOC emissions shall not exceed 10.8 tons per rolling 12-month period, from coating operations, for emissions units P072 through P077, combined.
- iv. VOC emissions shall not exceed 31.4 tons per rolling 12-month period, from rubber curing operations, for emissions units P072 through P077, combined.

It should be noted that the VOC emission limitations do not include VOC emissions associated with the combustion of natural gas in the drying ovens. VOC emissions from natural gas combustion are negligible and are not addressed in the emission limitation. Extruding operations are considered negligible for VOC emissions in these emissions units based on AP-42 Section 4.12 issued draft in November 2008.

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

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.



It should be noted that the requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. 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 this emissions unit group since the uncontrolled potential to emit (for each emissions unit separately) for VOC is less than 10 tons per year.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
 - a. The rolling 12-month production rate for emissions units P072 through P077, combined, shall not exceed 38,100 tons of rubber.
 - b. The maximum rolling 12-month coating usage rate for emissions units P072 through P077, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 10.8$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content, in pounds per gallon, of each material employed

G_i = gallons used of each VOC containing material for the annual period

n = total number of unique VOC containing materials employed

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the rubber production rate and coating usage rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P072 through P077, combined:
 - 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 rolling 12-month VOC emission rate from rubber curing and extruding operations, i.e. rolling 12-month total of d)(1)b, in tons;



- 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 rolling 12-month VOC emission rate for coatings, i.e. rolling 12-month total of d)(1)h., in tons.
- (2) The permit-to-install (PTI) application for these emissions units 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:

i. Toxic Contaminant: Acetophenone

TLV (mg/m³): 49

Maximum Hourly Emission Rates (lbs/hr):

P072, P074 through P077- 0.28; (each)
P073- 0.37

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

P072, P074 through P077- 78.9;
P073- 106

MAGLC (ug/m³): 1170

ii. Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 31

Maximum Hourly Emission Rate (lbs/hr):

P072, P074 through P077- 0.84; (each)
P073- 1.13

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

P072, P074 through P077- 112;
P073- 150

MAGLC (ug/m³): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from these emissions units, 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).



- (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.

- (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.
- (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.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the following:
 - a. the VOC content restriction of 1.90 pounds VOC per gallon of coating, as applied;
 - b. the rubber curing VOC restriction of 1.65 lbs VOC per ton of rubber cured
 - c. the rolling, 12-month coating usage rate [as determined from c)(1)b.];
 - d. the rolling, 12-month rubber production limitation of 38,100 tons.

These reports shall be submitted in accordance with deviation reporting requirements in the Standard Terms and Conditions of this permit.

- (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.
- (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. Emission Limitation:
1.90 pounds VOC per gallon of coating, as applied



Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated in accordance with the record-keeping requirements in d)(1)f.

b. Emission Limitation:

1.65 pounds VOC per ton of rubber cured

Applicable Compliance Method:

The VOC emission limitation was established in accordance with the emission factor of 8.25×10^{-4} lb VOC per lb rubber from AP-42 Section 4.12 (draft) Nov 2008. Compliance with this emissions factor was confirmed by representative emission testing for emissions unit P075 in April 2012.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR 60 Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

c. Emission Limitation:

10.8 tons VOC per rolling 12-month period, from coating operations (for emissions units P072 through P077, combined)

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated in accordance with the record-keeping requirements in d)(1)i.

d. Emission Limitation:

31.4 tons VOC per rolling 12-month period, from curing operations (for emissions units P072 through P077, combined)

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated in accordance with the record-keeping requirements in d)(1)c.

(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.



2. Emissions Unit Group -Group B - Cascade Lines: P078,P079,P080,

EU ID	Operations, Property and/or Equipment Description
P078	Flock Line #2
P079	Flock Line #3
P080	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) b)(1)e, 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)	<u>Coating operations:</u> 40.0 tons VOC per rolling, 12-month period, from coating operations, for emissions units P078 through P080, combined. <u>Rubber curing operations:</u> 1.65 lbs VOC per ton of rubber cured 16.6 tons VOC per rolling, 12-month period, for emissions units P078 through P080, combined. See b)(2)a.
b.	OAC rule 3745-21-07(M)(3)(e)	2.6 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
d.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
e.	OAC rule 3745-114-01 ORC 3704.04(F)	See d)(2) through d)(5), and e)(2).



(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations to represent the potential to emit (PTE). The PTE reflects the physical capacity and design of the flock line's operations to optimize flexibility and production capability. The legally and practically enforceable emission limitations are based on operational restrictions contained in c)(1):
 - i. The VOC emissions from rubber curing shall not exceed 1.65 pounds per ton of rubber cured.
 - ii. VOC emissions shall not exceed 40.0 tons per rolling 12-month period, from coating operations, for emissions units P078 through P080, combined.
 - iii. VOC emissions shall not exceed 16.6 tons per rolling 12-month period, from rubber curing operations, for emissions units P078 through P080, combined.

It should be noted that the VOC emission limitations do not include VOC emissions associated with the combustion of natural gas in the drying ovens. VOC emissions from natural gas combustion are negligible and are not addressed in the emission limitation. Extruding operations are considered negligible for VOC emissions in these emissions units based on AP-42 Section 4.12 issued draft in November 2008.

- b. The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC from these emissions units unless the VOC content of the adhesive or other coating employed within the flock lines does not exceed 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (as applied).
- c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restriction(s) established in accordance with OAC rule 3745-31-05(F) [See b)(2)c.]

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.

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.



- d. 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 this emissions unit group since the uncontrolled potential to emit (for each emissions unit separately) for VOC is less than 10 tons per year.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which represent the PTE [see b)(2)a.]:

- a. The rolling, 12-month production rate for emissions units P078 through P080, combined, shall not exceed 20,150 tons of rubber.
- b. The maximum rolling 12-month coating usage rate for emissions units P078 through P080, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 40.0$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content, in pounds per gallon, of each material employed

G_i = gallons used of each VOC containing material for the annual period

n = total number of unique VOC containing materials employed

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the rubber production rate and coating usage rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P078 through P080, combined:

- 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 rolling, 12-month VOC emission rate from rubber curing and extruding operations, i.e. rolling 12-month total of d)(1)b, in tons;
- 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 content for each coating, excluding water and exempt solvents, as applied;
 - h. the VOC emission rate for each coating material employed $[d)(1)e \times d)(1)f]$;
 - i. the total VOC emission rate for all coating materials employed $[\text{sum of } d)(1)h.]$; and
 - j. the rolling, 12-month VOC emission rate for coatings, i.e. rolling 12-month total of $d)(1)i.$, in tons.
- (2) The permit-to-install (PTI) application for these emissions units 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



Effective Date: To be entered upon final issuance

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:

i. Toxic Contaminant: Acetophenone

TLV (mg/m³): 49

Maximum Hourly Emission Rates (lbs/hr):

P078- 0.22;
P079 and P080- 0.37 (each)

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

P078- 67;
P079 and P080- 106

MAGLC (ug/m³): 1170

ii. Toxic Contaminant: Carbon Disulfide

TLV (mg/m³): 31

Maximum Hourly Emission Rate (lbs/hr):

P078- 0.71;
P079 and P080- 1.13 (each)

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

P078- 95;
P079 and P080- 150

MAGLC (ug/m³): 738

The permittee, has demonstrated that emissions of acetophenone and carbon disulfide, from these emissions units, 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).

(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.

- (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.
- (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.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the following:
 - a. the VOC content restriction of 2.6 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
 - b. the rubber curing VOC restriction of 1.65 lbs VOC per ton of rubber cured
 - c. the rolling, 12-month coating usage rate [as determined from c)(1)b];
 - d. the rolling, 12-month rubber production limitation of 20,150 tons.

These reports shall be submitted in accordance with deviation reporting requirements in the Standard Terms and Conditions of this permit.
 - (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.
 - (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. Emission Limitation:

2.6 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied.



Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated in accordance with the record keeping requirements in d)(1)g.

b. Emission Limitation:

1.65 pounds VOC per ton of rubber cured

Applicable Compliance Method:

The VOC emission limitation was established in accordance with the emission factor of 8.25×10^{-4} lb VOC per lb rubber from AP-42 Section 4.12 (draft) Nov 2008. Compliance with this emissions factor was confirmed by representative emission testing for emissions unit P079 in April 2012.

If required, the permittee shall demonstrate compliance in accordance with 40 CFR 60 Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

c. Emission Limitation:

40.0 tons VOC per rolling, 12-month period, from coating operations (for emissions units P078 through P080, combined)

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated in accordance with the record keeping requirements in d)(1)j.

d. Emission Limitation(s):

16.6 tons VOC per rolling, 12-month period, from curing operations (for emissions units P078 through P080, combined)

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated in accordance with the record keeping requirements in d)(1)c.

(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.