State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
SENECA COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17328
Fac ID: 0374010077
DATE: 10/16/2007

Roppe Corporation
Richard Ward
1602 N. Union Street
Fostoria, OH 44830

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 10/16/2007**
Terms and Conditions	**Effective Date: 10/16/2007**

FINAL PERMIT TO INSTALL 03-17328

Application Number:	03-17328
Facility ID:	0374010077
Permit Fee:	**$2250**
Name of Facility:	Roppe Corporation
Person to Contact:	Richard Ward
Address:	1602 N. Union Street Fostoria, OH 44830

Location of proposed air contaminant source(s) [emissions unit(s)]:
1602 N. Union Street
Fostoria, **Ohio**

Description of proposed emissions unit(s):
Kon Cure line numbers 1, 2, 3 and a mixer.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	23.35
PE	6.52

Emissions Unit ID: **P020**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment -(P020) - Mixer 2 including warm-up mill, super sack station, and cooling rack.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	22.67 lbs organic compound (OC)/day & 4.14 tons OC/yr from mixing operations (See A.2.d) 33.00 lbs OC/day & 6.02 tons OC/yr from milling operations (See A.2.d) 1.49 lbs particulate emissions (PE)/hr & 6.52 tons PE/yr from mixing operations (See A.2.a) Visible emissions shall not exceed 0% opacity, as a six-minute average from the baghouse exhaust
OAC rule 3745-21-07 (G) (2)	See A.2.b
OAC rule 3745-17-11 (B)	See A.2.c
OAC rule 3745-17-07 (A)	See A.2.c

2. Additional Terms and Conditions

2.a All PE from this emissions unit is assumed to be particulate matter less than 10 microns (PM10)

2.b OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A) (3).

2.d The emission limitations of 22.67 lbs OC/day from mixing operations and 33.00 lbs OC/day from milling operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P020:

   a. batches per month;

   b. pounds of material per batch;

   c. the OC emissions rate from mixing operations, in lbs/month (C.1.a. x C.1.b x 0.000123 lb OC/lb material mixed);

   d. the OC emissions rate from milling operations, in lbs/month (C.1.a x C.1.b. x 0.000179 lb OC/lb material milled);

   e. the annual, year-to-date OC emissions from mixing operations (sum of C.1.c. for each calendar month to date from January to December); and

   f. the annual, year-to-date OC emissions from milling operations (sum of C.1.d. for each calendar month to date from January to December).

2. The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible particulate emissions from the exhaust of the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;

   b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

Emissions Unit ID: **P020**

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the total OC emissions from mixing operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports that specify the total OC emissions from milling operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the exhaust of the capture system serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitation(s) specified in the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. <u>Emission Limitation:</u>
   22.67 lbs OC/day from mixing operations

   <u>Applicable Compliance Method:</u>
   The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

   *The potential to emit was based on the following:

   The maximum daily batches (288 batches/day) x the maximum pounds of rubber per batch (640 lbs rubber/batch) x an emission factor of 0.000123 lb OC/lb rubber from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

   b. <u>Emission Limitation:</u>
   33.00 lbs OC/day from milling operations

Applicable Compliance Method:
The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum daily batches (288 batches/day) x the maximum pounds of rubber per batch (640 lbs rubber/batch) x an emission factor of 0.000179 lb OC/lb rubber from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

c. Emission Limitation:
4.14 tons OC/yr from mixing operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation
6.02 tons OC/yr from milling operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

e. Emission Limitation:
1.49 lbs PE/hr

Applicable Compliance Method:
The permittee may demonstrate compliance with the emission limitation by multiplying the hourly uncontrolled mass rate of emissions [based on a process weight rate, in pounds rubber processed/hour, an uncontrolled release rate of 0.5% from clay, rubber, and rubber chemicals (engineering judgement) and an uncontrolled release rate of 0.05% from process oil (engineering judgement)], by a minimum control efficiency of 95%. If required, compliance shall be determined in accordance with the test methods and procedures in Methods 1 - 5 of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

6.52 tons PE/yr

Applicable Compliance Method:
The annual limit was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limit will also be assumed.

g. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P021**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (P021) - Kon Kure line 1 with autoclave, extruder and mill.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	14.67 lbs organic compounds (OC)/day & 2.68 tons OC/yr from milling operations 1.39 lbs OC/day & 0.25 ton OC/yr from extruding and curing operations
OAC rule 3745-21-07 (G) (2)	See A.2.a

2. Additional Terms and Conditions

2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

2.b The emission limitations of 14.67 lbs OC/day from milling operations and 1.39 lbs OC/day from extruding and curing operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P021:

a. pounds each of rubber milled, extruded, and cured;

b. the OC emissions rate from milling operations, in lbs/month (C.1.a. x 0.000179 lb OC/lb material milled);

c. the OC emissions rate from extruding operations and curing operations, in lbs/month (C.1.a x 0.0000083 lb OC/lb material extruded + C.1.a x 0.00000868 lb OC/lb material cured);

d. the annual, year-to-date OC emissions from milling operations (sum of C.1.b. for each calendar month to date from January to December); and

e. the annual, year-to-date OC emissions from extruding and curing operations (sum of C.1.c. for each calendar month to date from January to December).

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the total OC emissions from milling operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports that specify the total OC emissions from extruding and curing operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) specified in the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. <u>Emission Limitation:</u>
   14.67 lbs OC/day from milling operations

   <u>Applicable Compliance Method:</u>
   The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber milled/day x an emission factor of 0.000179 lb OC/lb rubber milled from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

b. Emission Limitation:
1.39 lbs OC/day from extruding and curing operations

Applicable Compliance Method:
The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber extruded/day x an emission factor of 0.0000083 lb OC/lb rubber extruded + the maximum lbs rubber cured/day x and emission factor of 0.00000868 lb OC/lb rubber cured. Emission factors from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

c. Emission Limitation:
2.68 tons OC/yr from milling operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation
0.25 ton OC/yr from extruding and curing operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

F. Miscellaneous Requirements

None

Emissions Unit ID: **P022**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment -(P022) - Kon Kure line 2 with autoclave, extruder, and mill.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	18.36 lbs organic compounds (OC)/day & 3.35 tons OC/yr from milling operations 9.75 lbs OC/day & 1.78 tons OC/yr from extruding and curing operations
OAC rule 3745-21-07 (G) (2)	See A.2.a

2. Additional Terms and Conditions

2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

2.b The emission limitations of 18.36 lbs OC/day from milling operations and 9.75 lbs OC/day from extruding and curing operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P022:

a. pounds each of rubber milled, extruded, and cured;

b. the OC emissions rate from milling operations, in lbs/month (C.1.a. x 0.000179 lb OC/lb material milled);

c. the OC emissions rate from extruding operations and curing operations, in lbs/month (C.1.a x 0.0000083 lb OC/lb material extruded + C.1.a x 0.00000868 lb OC/lb material cured);

d. the annual, year-to-date OC emissions from milling operations (sum of C.1.b. for each calendar month to date from January to December); and

e. the annual, year-to-date OC emissions from extruding and curing operations (sum of C.1.c. for each calendar month to date from January to December).

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the total OC emissions from milling operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports that specify the total OC emissions from extruding and curing operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) specified in the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. <u>Emission Limitation:</u>
   18.36 lbs OC/day from milling operations

   <u>Applicable Compliance Method:</u>
   The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber milled/day x an emission factor of 0.000179 lb OC/lb rubber milled from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

b. Emission Limitation:
9.75 lbs OC/day from extruding and curing operations

Applicable Compliance Method:
The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber extruded/day x an emission factor of 0.0000083 lb OC/lb rubber extruded + the maximum lbs rubber cured/day x and emission factor of 0.00000868 lb OC/lb rubber cured. Emission factors from AP-42 4.12, Draft 6/99 for Compound #22 which has the most similar rubber formula to the permittees process.

c. Emission Limitation:
3.35 tons OC/yr from milling operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation
1.78 tons OC/yr from extruding and curing operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment -(P023) - Kon Kure line 3 with autoclave, extruder, and mill.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (A) (3)	18.36 lbs organic compounds (OC)/day & 3.35 tons OC/yr from milling operations 9.75 lbs OC/day & 1.78 tons OC/yr from extruding and curing operations
OAC rule 3745-21-07 (G) (2)	See A.2.a

2. Additional Terms and Conditions

2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

2.b The emission limitations of 18.36 lbs OC/day from milling operations and 9.75 lbs OC/day from extruding and curing operations were established to reflect the potential to emit for this emissions unit. Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P023:

   a. pounds each of rubber milled, extruded, and cured;

   b. the OC emissions rate from milling operations, in lbs/month (C.1.a. x 0.000179 lb OC/lb material milled);

   c. the OC emissions rate from extruding operations and curing operations, in lbs/month (C.1.a x 0.0000083 lb OC/lb material extruded + C.1.a x 0.00000868 lb OC/lb material cured);

   d. the annual, year-to-date OC emissions from milling operations (sum of C.1.b. for each calendar month to date from January to December); and

   e. the annual, year-to-date OC emissions from extruding and curing operations (sum of C.1.c. for each calendar month to date from January to December).

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the total OC emissions from milling operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports that specify the total OC emissions from extruding and curing operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) specified in the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. <u>Emission Limitation:</u>
   18.36 lbs OC/day from milling operations

   <u>Applicable Compliance Method:</u>
   The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber milled/day x an emission factor of 0.000179 lb OC/lb rubber milled from AP-42 4.12, Draft 6/99 for Compound #22, which has the most similar rubber formula to the permittees process.

b. Emission Limitation:
9.75 lbs OC/day from extruding and curing operations

Applicable Compliance Method:
The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit was based on the following:

The maximum lbs rubber extruded/day x an emission factor of 0.0000083 lb OC/lb rubber extruded + the maximum lbs rubber cured/day x and emission factor of 0.00000868 lb OC/lb rubber cured. Emission factors from AP-42 4.12, Draft 6/99 for Compound #22 which has the most similar rubber formula to the permittees process.

c. Emission Limitation:
3.35 tons OC/yr from milling operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation
1.78 tons OC/yr from extruding and curing operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

F. Miscellaneous Requirements

None