

Synthetic Minor Determination and/or Netting Determination

Permit To Install No. 03-13066

Cooper Engineered Products

A. Source Description

Cooper Engineered Products submitted a PTI application for their rubber curing and extrusion operations, which included emissions units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054.

B. Facility Emissions and Attainment Status

Cooper Engineered Products is a PSD minor facility. The company has requested a federally enforceable VOC emission limitation for the purpose of maintaining their current PSD status. The facility is located in Wood County which is in attainment for all criteria pollutants.

C. Source Emissions

For purposes of maintaining the company's PSD minor facility status and reducing potential VOC emissions, the permittee has requested a federally enforceable, combined limitation for emissions units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per year based on an annual production rate limitation.

D. Conclusion

Federally enforceable permit conditions will reduce potential VOC emission to 20.8 tons per year.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
WOOD COUNTY

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 03-13066

DATE: 2/6/2001

Cooper Engineered Products
Heather Beery
1175 N Main St
Bowling Green, OH 43402

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$2100 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NWDO IN MI Toledo Metro Area Coun of Govt



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Terms and Conditions

DRAFT PERMIT TO INSTALL 03-13066

Application Number: 03-13066
APS Premise Number: 0387020045
Permit Fee: **To be entered upon final issuance**
Name of Facility: Cooper Engineered Products
Person to Contact: Heather Beery
Address: 1175 N Main St
Bowling Green, OH 43402

Location of proposed air contaminant source(s) [emissions unit(s)]:

1175 N. Main St.
Bowling Green, Ohio

Description of proposed emissions unit(s):

Plant Wide Rubber Curing Operations.

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

Director

Cooper Engineered Products

Facility ID: 0387020045

PTI Application: 03-13066

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

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

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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

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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).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

11. 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.

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B. State Only Enforceable 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 Related to Monitoring and Recordkeeping 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 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 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 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 quarterly, i.e., 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. 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.

4. 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.

5. 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.

6. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. Construction Compliance Certification

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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.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	20.8

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Cascade Line #2 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P003

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 8.25E-4 lb VOC per lb of rubber cured and 3.52E-6 lb VOC per lb of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Coope

PTI A

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None

Emissions Unit ID: P003

Coope
PTI A

Emissions Unit ID: P003

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Cascade Line #2 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- 1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual

Emissions Unit ID: P003

materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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.).

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If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Cascade Line #3 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Issued: To be entered upon final issuance

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

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*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

Cooper Engineered Products
PTI Application: 03 13066
Issued

Facility ID: 0387020045

Emissions Unit ID: P005

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Cascade Line #3 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- 1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual

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materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI A

Emissions Unit ID: P012

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - Flock #1 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.80 lb Organic Compounds (VOC)/hr & 3.5 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P012

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.80 lb VOC/hr & 3.5 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 960 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Coope

PTI A

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None

Emissions Unit ID: P012

Coope
PTI A

Emissions Unit ID: P012

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B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - Flock #1 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions"

Emissions Unit ID: P012

policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

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change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI A

Emissions Unit ID: P016

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Flock #2 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.80 lb Organic Compounds (VOC)/hr & 3.5 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

Emissions Unit ID: P016

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors

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are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.80 lb VOC/hr & 3.5 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 960 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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PTI Application: 02 13066
Issued

Facility ID: 0387020045

Emissions Unit ID: P016

None

Coope

PTI A

Emissions Unit ID: P016

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Flock #2 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions"

Issued: To be entered upon final issuance

policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - Flock #3 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.80 lb Organic Compounds (VOC)/hr & 3.5 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P019

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.80 lb VOC/hr & 3.5 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 960 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Coope

PTI A

Issued: To be entered upon final issuance

None

Emissions Unit ID: P019

Coope
PTI A

Emissions Unit ID: P019

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - Flock #3 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- 1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions"

Emissions Unit ID: P019

policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

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change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P023 - Dual Durometer #6 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.99 lb Organic Compounds (VOC)/hr & 4.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

Emissions Unit ID: P023

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors

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are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.99 lb VOC/hr & 4.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 1200 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Cooper Engineered Products

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Facility ID: 0387020045

Emissions Unit ID: P023

None

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B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P023 - Dual Durometer #6 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

Issued: To be entered upon final issuance

permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

Emissions Unit ID: P023

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI A

Emissions Unit ID: P026

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Dual Durometer #7 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P026

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Coope

PTI A

Issued: To be entered upon final issuance

None

Emissions Unit ID: P026

Coope

PTI A

Emissions Unit ID: P026

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Dual Durometer #7 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

Emissions Unit ID: P026

permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Dual Durometer #8 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. **Additional Terms and Conditions**

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission

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factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Cooper Engineered Products

PTI Application: 02 13066

Issued

Facility ID: 0387020045

Emissions Unit ID: P028

None

Coope

PTI A

Emissions Unit ID: P028

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Dual Durometer #8 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

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permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

Emissions Unit ID: P028

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P038 - Cascade Line #1 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P038

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Coope

PTI A

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None

Emissions Unit ID: P038

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P038 - Cascade Line #1 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- 1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

Emissions Unit ID: P038

permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - Dual Durometer #9 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

Emissions Unit ID: P046

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors

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are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Cooper Engineered Products

PTI Application: 02 13066

Issued

Facility ID: 0387020045

Emissions Unit ID: P046

None

Coope

PTI A

Emissions Unit ID: P046

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - Dual Durometer #9 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

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permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

Emissions Unit ID: P046

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Emissions Unit ID: P049

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - Flock #4 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.80 lb Organic Compounds (VOC)/hr & 3.5 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P049

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.80 lb VOC/hr & 3.5 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 960 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Issued: To be entered upon final issuance

None

Emissions Unit ID: P049

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PTI A

Emissions Unit ID: P049

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - Flock #4 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions"

Emissions Unit ID: P049

policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the

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change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - Dual Durometer #1 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

Emissions Unit ID: P050

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors

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are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Facility ID: 0387020045

Emissions Unit ID: P050

None

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PTI A

Emissions Unit ID: P050

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - Dual Durometer #1 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

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permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

Emissions Unit ID: P050

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 - Dual Durometer #2 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P051

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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None

Emissions Unit ID: P051

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 - Dual Durometer #2 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- 1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

Emissions Unit ID: P051

permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P052 - Dual Durometer #3 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

Emissions Unit ID: P052

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors

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are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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Facility ID: 0387020045

Emissions Unit ID: P052

None

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B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P052 - Dual Durometer #3 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

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permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

Emissions Unit ID: P052

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P053 - Dual Durometer #4 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and

Emissions Unit ID: P053

- f. beginning the first 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:

The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

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None

Emissions Unit ID: P053

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B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P053 - Dual Durometer #4 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

Emissions Unit ID: P053

permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; 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 "Air Toxic Policy" 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-

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01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P054 - Dual Durometer #5 Rubber Curing and Extrusion.	OAC rule 3745-31-05(A)(3)	0.75 lb Organic Compounds (VOC)/hr & 3.3 tons VOC/yr See A.I.2.a.
	OAC rule 3745-31-05 (D)	Group Limit 20.8 tons VOC/yr (see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).
- 2.b The permittee has requested a federally enforceable, combined emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per rolling 12-month period based on production restrictions for purposes of maintaining PSD minor facility status (see A.II.1.).
- 2.c The emissions unit is not subject to the requirements of OAC rule 3745-21-07 (G) because liquid organic materials are not employed.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined shall not exceed 25,000 tons of rubber per year, based on a rolling 12-month summation of the monthly production rates.

Emissions Unit ID: P054

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production rates specified in the following table:

Month(s)	Maximum Allowable Cumulative Production (tons)
1	7000
1-2	10000
1-3	13000
1-4	16000
1-5	19000
1-6	22000
1-12	25,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitations for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 shall be based upon a rolling, 12-month summation of the monthly production rates.

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the group emission limitation of 20.8 tons per year and the maximum allowable production limit of 25,000 tons of rubber per rolling, 12-month period, the permittee shall collect and record the following information each month for the grouped emission units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054:
 - a. the quantity of rubber cured and extruded, in tons;
 - b. the monthly VOC emission rate*, in tons;
 - c. during the first 12 calendar months of operation following startup, the cumulative quantity of rubber cured and extruded, in tons;
 - d. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the quantity of rubber cured and extruded, in tons;
 - e. during the first 12 calendar months of operation following startup, the cumulative emission rate for VOC, in tons; and
 - f. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for VOC, in tons.

*The permittee shall use the most current Rubber Manufacturers Association (RMA) emission factors, available for these operations. At the time of issuance of this permit, these emission factors

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are 0.825 lbs VOC per 1000 lbs of rubber cured and 0.00352 lbs of VOC per 1000 lbs of rubber extruded.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable rubber production limitations; and
 - b. the annual rubber production limitations and VOC emission limitation for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined, per rolling 12-month period.

V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitation:
0.75 lb VOC/hr & 3.3 tons VOC/yr

Applicable Compliance Method:
The hourly and annual VOC limits for rubber curing & extruding are based on the emission unit's potential to emit (maximum rubber throughput of 900 lbs/hr multiplied by the RMA emission factors for rubber curing & extruding, see A.III.1.), at a maximum operating schedule of 8760 hrs/yr. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. If required, compliance with the hourly emissions rate shall be based on stack testing using the methods and procedures specified in Method 25/25A of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
Group limit of 20.8 tons/yr

Applicable Compliance Method:
Compliance with the annual emission limitation shall be determined by the record keeping required in condition A.III.1.

VI. Miscellaneous Requirements

121

Cooper Engineered Products

PTI Application: 02 13066

Issued

Facility ID: 0387020045

Emissions Unit ID: P054

None

Coope

PTI A

Emissions Unit ID: P054

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P054 - Dual Durometer #5 Rubber Curing and Extrusion.		See B.VI. below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for these emissions units (P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the

Issued: To be entered upon final issuance

permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit, with a TLV value and maximum annual emissions in excess of one ton, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32.17

MAGLC (ug/m3): 38

Pollutant: Carbon Disulfide*

TLV (ug/m3): 31,100

Maximum Hourly Emission Rate (lbs/hr): 12.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 525.42

MAGLC (ug/m3): 740

*Based on the conservative assumption that carbon disulfide emissions represent the emissions of all pollutants except benzene.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g.,

Emissions Unit ID: P054

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066 Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations. CITY/TWP Bowling Green

SIC CODE 3069 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Cascade Line #2 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NOIDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE, SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION Cascade Line #3 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SC

PTI Num

FACILITY

Emissions Unit ID: P054

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations. **CITY/TWP** Bowling Green

SIC CODE 3069 **SCC CODE** 3-08-999-99 **EMISSIONS UNIT ID** P012

EMISSIONS UNIT DESCRIPTION Flock #1 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.80 lbs VOC/day	3.5	0.80 lbs VOC/day	3.5
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P016

EMISSIONS UNIT DESCRIPTION Flock #2 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.80 lbs VOC/day	3.5	0.80 lbs VOC/day	3.5
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P019

EMISSIONS UNIT DESCRIPTION Flock #3 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.80 lbs VOC/day	3.5	0.80 lbs VOC/day	3.5
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: P054

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations. CITY/TWP Bowling Green

SIC CODE 3069 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P023

EMISSIONS UNIT DESCRIPTION Dual Durometer #6 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.99 lbs VOC/day	4.3	0.99 lbs VOC/day	4.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P026

EMISSIONS UNIT DESCRIPTION Dual Durometer #7 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P028

EMISSIONS UNIT DESCRIPTION Dual Durometer #8 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P038

EMISSIONS UNIT DESCRIPTION Cascade Line #1 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SC

PTI Num

FACILITY

Emissions Unit ID: P054

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations. CITY/TWP Bowling Green

SIC CODE 3069 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P046

EMISSIONS UNIT DESCRIPTION Dual Durometer #9 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P049

EMISSIONS UNIT DESCRIPTION Flock #4 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.80 lbs VOC/day	3.5	0.80 lbs VOC/day	3.5
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P050

EMISSIONS UNIT DESCRIPTION Dual Durometer #1 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SC

PTI Num

FACILITY

Emissions Unit ID: P054

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations. CITY/TWP Bowling Green

SIC CODE 3069 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P051

EMISSIONS UNIT DESCRIPTION Dual Durometer #2 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P052

EMISSIONS UNIT DESCRIPTION Dual Durometer #3 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P053

EMISSIONS UNIT DESCRIPTION Dual Durometer #4 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

140 NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP Bowling Green

Emissions Unit ID: P054

SIC CODE 3069

SCC CODE 3-08-999-99

EMISSIONS UNIT ID P054

EMISSIONS UNIT DESCRIPTION Dual Durometer #5 Rubber Curing and Extrusion.

DATE INSTALLED 10/79

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	0.75 lbs VOC/day	3.3	0.75 lbs VOC/day	3.3
Combined VOC for P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054					20.8
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NO

NESHAP? NO

PSD? NO

OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination COMPLIANCE WITH THE TERMS AND CONDITIONS OF THIS PERMIT.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: FORMALDEHYDE AND SULFURIC ACID

14 NEW SC

PTI Num

FACILITY

Emissions Unit ID: P054

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations. CITY/TWP Bowling Green

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

This permit to install is for rubber curing and extrusion, which includes emissions units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054. The company requested a synthetic minor to reduce potential emissions of VOC. See submitted hard copy, permit review/calculations form, for additional information.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

Cooper Engineered Products submitted a PTI application for their rubber curing and extrusion operations, which included emissions units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054.

B. Facility Emissions and Attainment Status

Cooper Engineered Products is a PSD minor facility. The company has requested a federally enforceable VOC emission limitation for the purpose of maintaining their current PSD status. The facility is located in Wood County which is in attainment for all criteria pollutants.

C. Source Emissions

NEW SOURCE REVIEW FORM B

PTI Number: 03-13066

Facility ID: 0387020045

FACILITY NAME Cooper Engineered Products

FACILITY DESCRIPTION Plant Wide Rubber Curing Operations.

CITY/TWP

Bowling Green

Emissions Unit ID: P054

For purposes of maintaining the company's PSD minor facility status and reducing potential VOC emissions, the permittee has requested a federally enforceable, combined limitation for emissions units: P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 of 20.8 tons VOC per year based on an annual production rate limitation.

D. Conclusion

Federally enforceable permit conditions will reduce potential VOC emission to 20.8 tons per year.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

VOC

20.8