



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
WOOD COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-17440**

**Fac ID: 0387020045**

**DATE: 5/27/2008**

Cooper Engineered Products  
Stacey Rader  
1175 N Main St  
Bowling Green, OH 43402

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

NWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 5/27/2008  
Effective Date: 5/27/2008**

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**FINAL PERMIT TO INSTALL 03-17440**

Application Number: 03-17440  
Facility ID: 0387020045  
Permit Fee: **\$700**  
Name of Facility: Cooper Engineered Products  
Person to Contact: Stacey Rader  
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):

**Modification to dual durometer line 8 (P028) by removing 2 spray booths and adding a cure oven and a uv cure system (R015).**

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

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Chris Korleski  
Director

## 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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## **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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit 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.

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- 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 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 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 ninety (90) 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.

#### 12. Air Pollution Nuisance

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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.

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. 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

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of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

**5. Construction of New Sources(s)**

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

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. 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., postmarked), 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	7.53
PE	1.36

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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.

**Operations, Property, and/or Equipment - (P028) - Dual Durometer No. 8 Rubber Curing and Extrusion (modification of PTI No. 03-13984 issued final on June 19, 2003 to increase pounds per hour limit for P028).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	1.41 pounds volatile organic compounds (VOC) per hour and 6.17 tons VOC per year  See A.I.2.a
OAC rule 3745-31-05(C)	20.8 tons VOC per rolling, 12-month period from emission units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054 combined (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(C).
- 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: P028

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 are 8.25E-4 lb VOC per lb of rubber cured and 3.52E-6 lb VOC

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per lb of rubber extruded.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedance of the following:
  - a. the annual rubber production limitation of 25,000 tons/rolling, 12-month period for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined; and,
  - b. the VOC emission limitation of 20.8 tons/rolling, 12-month period for emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined.

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

#### V. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
  - a. Emission Limitation:  
1.41 pound VOC/hour, 6.17 tons VOC/year

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 1700 pounds/hour 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 recordkeeping, 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 Methods 1-4 and 25/25A of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:  
20.8 tons/rolling, 12-month period from emissions units P003, P005, P012, P016, P019, P023, P026, P028, P038, P046, P049, P050, P051, P052, P053, and P054, combined

Emissions Unit ID: P028

Applicable Compliance Method:

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

c. Emission Limitation:

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 rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual production limitation shall be determined by the recordkeeping required in condition A.III.1.

**VI. Miscellaneous Requirements**

1. This permit shall supercede the terms and conditions associated with this emissions unit referenced in PTI #03-13984 issued final on June 19, 2003.

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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.

**Operations, Property, and/or Equipment - (P028) - Dual Durometer #8 Rubber Curing and Extrusion (modification of PTI #03-13984 issued final on June 19, 2003 to increase pounds per hour limit for P028).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	See B.III. below

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit was evaluated based on the actual materials used and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. 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 using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: acetophenone

TLV (mg/m<sup>3</sup>): 49

Maximum Hourly Emission Rate (lbs/hr): 0.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 102.6

MAGLC (ug/m<sup>3</sup>): 1,167

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Pollutant: carbon disulfide

TLV (mg/m<sup>3</sup>): 31

Maximum Hourly Emission Rate (lbs/hr): 1.12

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 149.6

MAGLC (ug/m<sup>3</sup>): 738

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 (typically for coatings or cleanup materials), 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(QQQ)(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 (QQQ)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. 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:"

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- 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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**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: 5/27/2008

**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.

**Operations, Property, and/or Equipment - (R015) - Dual durometer line #8 includes: superjet, oven 1, oven ends and UV cure, spray booth 1, coating cure oven 1, EPDM extruder and IR heaters. This is a modification to PTI #03-13675 issued final in 2/28/2002.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.31 pounds volatile organic compounds (VOC) per hour and 1.36 tons VOC per year  0.04 pounds particulate emissions (PE) per hour and 0.18 tons PE per year  Visible PE shall not exceed 5 percent opacity, as a six-minute average, except as provided by rule
OAC rule 3745-17-11(B)	See A.I.2.a
OAC rule 3745-21-07(G)(2)	None (See A.II.1.)
OAC rule 3745-21-07(G)(1)	See A.I.2.c
OAC rule 3745-17-07(A)	See A.I.2.a

**2. Additional Terms and Conditions**

- 2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The 0.31 pounds VOC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and reporting requirements to ensure compliance with this limitation.
- 2.c The emission limitation established by this rule is less stringent than the

Emissions Unit ID: R015

emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation of 0.31 pounds VOC/hour from the entire line is a summation of the individual potential to emit from each component of the line. The curing oven contributes 0.03 pounds VOC/hour which is more stringent than the 3 pounds OC/hour and 15 pounds OC/day established by OAC rule 3745-21-07(G)(1). See Section A.V.1.a for details on curing oven emissions.

**2.d** All PE is considered as particulate matter 10 microns in diameter or less (PM10).

## II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system on this emissions unit whenever it is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit R015:
  - a. the company identification of each coating and ink employed;
  - b. documentation on whether or not each material employed is a photochemically reactive material;
  - c. the quantity of each coating and ink employed, in gallons;
  - d. the VOC content of each coating and ink employed, in pounds/gallon, as applied;
  - e. the VOC emissions from each coating and ink, in pounds (A.III.1.c multiplied by A.III.1.d);
  - f. the total VOC emissions from all coatings and inks (summation of A.III.1.e);
  - g. the annual, year-to-date VOC emissions from emissions unit R015 (summation of A.III.1.f, in tons, for each calendar month to date from January to December).

Note: the coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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#### IV. Reporting Requirements

1. The permittee shall notify the Director (the Northwest District Office) in writing of any daily record showing the use of photochemically reactive materials in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days after the event occurs.
3. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation of 1.36 tons VOC/year. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:  
0.31 pounds VOC/hour

Applicable Compliance Method:

The 0.31 pounds VOC/hour emission limitation is based on the potential to emit\* for this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for the entire dual durometer line (R015) is based on the addition of the potential emissions from each individual component of the line. Emissions unit R015 consists of three individual components:

1. Booth #1 - (B1)
2. Curing Oven #1 - (CO1)

Emissions Unit ID: R015

## 3. Ink Application - (IA)

The potential to emit for emission unit R015 was based on the following equation:

$$\text{PTE} = \text{B1} + \text{CO1} + \text{IA}$$

where:

PTE = Potential to Emit for Dual Durometer Line (R015), in lbs VOC/hr

B1 = Potential Emissions from Booth #1, in lbs VOC/hr = (maximum coating usage rate of 0.8 gal/hr) x (maximum VOC content of 0.38 lb VOC/gal) x (90% emission rate)\* = 0.27 lb VOC/hr

CO1 = Potential Emissions from Curing Oven #1, in lbs VOC/hr = (maximum coating usage rate of 0.8 gal/hr) x (maximum VOC content of 0.38 lb VOC/gal) x (10% emission rate)\* = 0.03 lb VOC/hr

IA = Potential Emissions from Ink Application = (maximum ink usage rate of 0.001 gal/hr) x (maximum VOC content of 6.8 lb VOC/gal) = 0.007 lb VOC/hr

$$\text{PTE} = (0.21 + 0.02 + 0.007) \text{ lb VOC/hr} = 0.31 \text{ lb VOC/hr}$$

\*For purposes of determining the VOC emission rates between coating operations and the associated oven, the permittee shall utilize a value of 90% as the maximum percentage of the volatile organic compounds employed in the coating operations that are emitted uncontrolled. The remaining 10% of the volatile organic compounds employed shall be considered to be the uncontrolled emissions for the associated oven. This "split" of volatile organic compound emissions between this emissions unit and the associated oven is based upon engineering estimation.

- b. Emission Limitation:  
1.36 tons VOC/year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the monitoring and recordkeeping in Section A.III.1.

- c. Emission Limitation:  
0.04 pound PE/hour

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Applicable Compliance Method:

Compliance with the hourly particulate emission limitation shall be demonstrated by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in pounds/hour}) \times (1-TE) \times (1-CE)$$

Where:

E= particulate emission rate, in pounds/hour

TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.

CE= control efficiency of the control equipment

If required, the permittee shall demonstrate compliance in accordance with Method 5, which is located in 40 CFR Part 60, Appendix A.

- d. Emission Limitation:  
0.18 ton PE/year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours/year and dividing by a conversion factor of 2000 pound/ton.

- e. Emission Limitation:  
Visible PE shall not exceed 5 percent opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

1. This permit shall supercede the terms and conditions associated with this emissions unit referenced in PTI #03-13675 issued final on February 28, 2002.

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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.

**Operations, Property, and/or Equipment - (R015) - Dual durometer line No. 8 includes: superjet, oven 1, oven ends and UV cure, spray booth 1, coating cure oven 1, EPDM extruder and IR heaters. This is a modification to PTI 03-13675 issued final on 2/28/2002.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	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. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic

Emissions Unit ID: R015

compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.

SIC CODE 3069 SCC CODE 3-08-999-99 EMISSIONS UNIT ID P028  
 EMISSIONS UNIT DESCRIPTION Dual Durometer #8 Rubber Curing and Extrusion (modification of PTI #03-13984 issued final on June 19, 2003 to increase pounds per hour limit for P028).  
 DATE INSTALLED 10/1979

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 <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds				1.41	6.17
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics				0.36	
Acetophenone				1.12	
Carbon Disulfide					

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?**  
**The facility is required to demonstrate compliance with the emission limitations as well as 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\*?                      X                      YES                      NO

IDENTIFY THE AIR CONTAMINANTS:                      Acetophenone and Carbon disulfide (Modeling was performed previously and an interpolation was made regarding the MAGLC - SCREEN 3.0 not performed in this case).

