

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **03-13512**  
Bridgestone APM-RTM Plant

A. Source Description

Bridgestone APM Company has proposed to install 5 new coating operations. All emissions units are subject to OAC rule 3745-21-09(U)(2)(e)(iii). All emissions will be vented to a common RTO that will be 95% efficient in reducing OC emissions. The tons OC per year facility-wide PTE falls below the 100 tons per year threshold for Title V applicability.

B. Facility Emissions and Attainment Status

The facility maintains a Non-Title V status. Wyandot county is attainment for all criteria pollutants.

C. Source Emissions

POTENTIAL EMISSIONS: Without any restrictions, the facility would become a Title V facility.

RESTRICTING POTENTIAL EMISSIONS: The facility requested that emissions limits be based on a destruction efficiency of 95% from a RTO that will be installed for controlling OC emissions below Title V levels.

D. Conclusion

With the annual emissions for all five emissions units restricted by the use of an RTO in this permit, the OC emissions will be below the 100 ton per year Title V threshold. Therefore, the facility will not be considered Title V.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
WYANDOT COUNTY  
Application No: 03-13512**

**CERTIFIED MAIL**

**DATE:** 2/27/2001

Bridgestone APM-RTM Plant  
Joseph Clark  
1800 Industrial Drive  
Findlay, OH 45840

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 **\$2000** 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, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA      NWDO      MI



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 03-13512**

Application Number: 03-13512  
APS Premise Number: 0388010047  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Bridgestone APM-RTM Plant  
Person to Contact: Joseph Clark  
Address: 1800 Industrial Drive  
Findlay, OH 45840

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

**235 Commerce Way  
Upper Sandusky, Ohio**

Description of proposed emissions unit(s):

**2 rotary index spray coating machines, 1 robotic spray coating machine, and 2 chain-on-edge spray coating machines with all machines controlled by regenerative thermal oxidizer.**

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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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements 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 information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

**Bridgestone APM-RTM Plant**

**Facility ID: 0388010047**

**PTI Application: 03-13512**

**Issued: To be entered upon final issuance**

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

- 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 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.

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.76

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Index coating operation #1. Operation consists of emissions unit applying primer coating and a topcoat within one machine.	OAC rule 3745-21-09-(U)(2)(e)(iii) OAC rule 3745-31-05(A)(3)	See A.I.2.a.  Use of regenerative thermal oxidizer (RTO) (see A.1.2.b)  <u>Emissions from Primer Coating Operation</u> 0.07 lb organic compounds (OC)/hour, 0.31 ton OC/year;  Group Limit- 1.34 ton OC/year (see A.I.2.c)  <u>Emissions from Topcoat Coating Operation</u> 0.07 lb OC/hour, 0.31 ton OC/year;  Group Limit- 1.42 ton OC/year (see A.I.2.d)

**2. Additional Terms and Conditions**

- 2.a The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The BAT determination was made in accordance with a request by the permittee to voluntarily limit allowable emissions of OC to the following federally enforceable

**Bridgestone APM-RTM Plant**  
**PTI Limitations 03-13-13**  
**Issue**

**Facility ID: 0388010047**

Emissions Unit ID: **K004**

limitations:

Primer coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

Topcoat coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

The federally enforceable limitations are based on the use of a regenerative thermal oxidizer with a capture efficiency of 100% and a control device destruction efficiency of 95%.

The permittee has requested federally enforceable limitations for purposes of maintaining non-title V status.

- 2.c** Combined annual OC emissions from primer coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.34 tons per year.
- 2.d** Combined annual OC emissions from topcoat coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.42 tons per year.
- 2.e** For purposes of federal enforceability, emission limitations on OC effectively limit emissions of VOC.

## **B. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations and, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring

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Emissions Unit ID: **K004**

equipment, when the emissions unit was in operation; and

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- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation was more than 50 degrees Fahrenheit below the average temperature during the most recent stack test that demonstrated that the emissions units were in compliance.
2. The permittee shall collect and record the following information each month for primer coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each primer coating employed;
  - b. the number of gallons of each primer coating employed;
  - c. the organic compound content of each primer coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all primer coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all primer coatings, for the calendar year to date, in tons per year.
3. The permittee shall collect and record the following information each month for topcoat coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each topcoat coating employed;
  - b. the number of gallons of each topcoat coating employed;
  - c. the organic compound content of each topcoat coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all topcoat coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all topcoat coatings, for the calendar year to date, in tons per year.

**D. Reporting Requirements**

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Emissions Unit ID: **K004**

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1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The deviation reports and summaries required by D.1 and D.2 shall be submitted in accordance with the general terms and conditions of this permit.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the primer coating operation and topcoat coating operation group limits associated with emissions units K004, K005, K006, K007, and K008.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 3 months after start of emissions unit;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control device efficiency requirements;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
  - d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent

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reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**  
0.07 lbs OC/hour from primer coating operation

**Applicable Compliance Method:**

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (6.80 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.

- b. **Emission Limitation:**

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**PTI Application 02-12512**  
**Issue**

**Facility ID: 0388010047**

Emissions Unit ID: **K004**

0.31 tons OC/year from primer coating operation

**Applicable Compliance Method:**

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

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- c. **Emission Limitation:**  
Group limit of 1.34 tons OC/year from primer coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.2.
- d. **Emission Limitation:**  
0.07 lbs OC/hour from topcoat coating operation  
  
**Applicable Compliance Method:**  
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (7.20 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.
- e. **Emission Limitation:**  
0.31 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.  
  
\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.
- f. **Emission Limitation:**  
Group limit of 1.42 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.3.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound from emissions units K004, K005, K006, K007, and K008 contained in PTI 03-13512 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

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Emissions Unit ID: **K004**

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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 new permit to install.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Index coating operation #2. Operation consists of emissions unit applying primer coating and a topcoat within one machine.	OAC rule 3745-21-09-(U)(2)(e)(iii)  OAC rule 3745-31-05(A)(3)	See A.I.2.a.  Use of regenerative thermal oxidizer (RTO) (see A.1.2.b)  <u>Emissions from Primer Coating Operation</u> 0.07 lb organic compounds (OC)/hour, 0.31 ton OC/year;  Group Limit- 1.34 ton OC/year (see A.I.2.c)  <u>Emissions from Topcoat Coating Operation</u> 0.07 lb OC/hour, 0.31 ton OC/year;  Group Limit- 1.42 ton OC/year (see A.I.2.d)

**2. Additional Terms and Conditions**

- 2.a The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The BAT determination was made in accordance with a request by the permittee to

**Bridgestone APM-RTM Plant**  
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**Issue**

**Facility ID: 0388010047**

Emissions Unit ID: **K005**

voluntarily limit allowable emissions of OC to the following federally enforceable limitations:

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Emissions Unit ID: **K005**

Primer coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

Topcoat coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

The federally enforceable limitations are based on the use of a regenerative thermal oxidizer with a capture efficiency of 100% and a control device destruction efficiency of 95%.

The permittee has requested federally enforceable limitations for purposes of maintaining non-title V status.

- 2.c** Combined annual OC emissions from primer coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.34 tons per year.
- 2.d** Combined annual OC emissions from topcoat coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.42 tons per year.
- 2.e** For purposes of federal enforceability, emission limitations on OC effectively limit emissions of VOC.

## **B. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations and, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

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Emissions Unit ID: **K005**

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- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation; and

- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation was more than 50 degrees Fahrenheit below the average temperature during the most recent stack test that demonstrated that the emissions units were in compliance.
2. The permittee shall collect and record the following information each month for primer coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each primer coating employed;
  - b. the number of gallons of each primer coating employed;
  - c. the organic compound content of each primer coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all primer coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all primer coatings, for the calendar year to date, in tons per year.
3. The permittee shall collect and record the following information each month for topcoat coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each topcoat coating employed;
  - b. the number of gallons of each topcoat coating employed;
  - c. the organic compound content of each topcoat coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all topcoat coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all topcoat coatings, for the calendar year to date, in tons per year.

**D. Reporting Requirements**

**Issue**

Emissions Unit ID: **K005**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

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Emissions Unit ID: **K005**

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2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The deviation reports and summaries required by D.1 and D.2 shall be submitted in accordance with the general terms and conditions of this permit.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the primer coating operation and topcoat coating operation group limits associated with emissions units K004, K005, K006, K007, and K008.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 3 months after start-up of the emissions unit;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control efficiency requirements;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
  - d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and

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validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**  
0.07 lbs OC/hour from primer coating operation

**Applicable Compliance Method:**

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (6.80 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.

- b. **Emission Limitation:**  
0.31 tons OC/year from primer coating operation

**Applicable Compliance Method:**

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

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- c. **Emission Limitation:**  
Group limit of 1.34 tons OC/year from primer coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.2.
  
- d. **Emission Limitation:**  
0.07 lbs OC/hour from topcoat coating operation  
  
**Applicable Compliance Method:**  
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (7.20 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.
  
- e. **Emission Limitation:**  
0.31 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.  
  
\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.
  
- f. **Emission Limitation:**  
Group limit of 1.42 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.3.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound from emissions units K004, K005, K006, K007, and K008 contained in PTI 03-13512 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

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Emissions Unit ID: **K005**

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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 new permit to install.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Robot coating operation. Operation consists of emissions unit applying primer coating and a topcoat within one machine.	OAC rule 3745-21-09-(U)(2)(e)(iii)  OAC rule 3745-31-05(A)(3)	See A.I.2.a.  Use of regenerative thermal oxidizer (RTO) (see A.1.2.b)  <u>Emissions from Primer Coating Operation</u> 0.03 lb organic compounds (OC)/hour, 0.13 ton OC/year;  Group Limit- 1.34 ton OC/year (see A.I.2.c)  <u>Emissions from Topcoat Coating Operation</u> 0.04 lb OC/hour, 0.18 ton OC/year;  Group Limit- 1.42 ton OC/year (see A.I.2.d)

**2. Additional Terms and Conditions**

- 2.a The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The BAT determination was made in accordance with a request by the permittee to voluntarily limit allowable emissions of OC to the following federally enforceable

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limitations:

Emissions Unit ID: **K006**

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Emissions Unit ID: **K006**

Primer coating operations- 0.03 lb OC/hour and 0.13 ton OC/year

Topcoat coating operations- 0.04 lb OC/hour and 0.18 ton OC/year

The federally enforceable limitations are based on the use of a regenerative thermal oxidizer with a capture efficiency of 100% and a control device destruction efficiency of 95%.

The permittee has requested federally enforceable limitations for purposes of maintaining non-title V status.

- 2.c** Combined annual OC emissions from primer coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.34 tons per year.
- 2.d** Combined annual OC emissions from topcoat coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.42 tons per year.
- 2.e** For purposes of federal enforceability, emission limitations on OC effectively limit emissions of VOC.

## **B. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations and, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

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Emissions Unit ID: **K006**

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- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation; and

- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation was more than 50 degrees Fahrenheit below the average temperature during the most recent stack test that demonstrated that the emissions units were in compliance.
2. The permittee shall collect and record the following information each month for primer coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each primer coating employed;
  - b. the number of gallons of each primer coating employed;
  - c. the organic compound content of each primer coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all primer coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all primer coatings, for the calendar year to date, in tons per year.
3. The permittee shall collect and record the following information each month for topcoat coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each topcoat coating employed;
  - b. the number of gallons of each topcoat coating employed;
  - c. the organic compound content of each topcoat coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all topcoat coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all topcoat coatings, for the calendar year to date, in tons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

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Emissions Unit ID: **K006**

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2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The deviation reports and summaries required by D.1 and D.2 shall be submitted in accordance with the general terms and conditions of this permit.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the primer coating operation and topcoat coating operation group limits associated with emissions units K004, K005, K006, K007, and K008.

#### **E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 3 months after start-up of the emissions unit;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control efficiency requirements;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
  - d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and

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validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**  
0.03 lbs OC/hour from primer coating operation

**Applicable Compliance Method:**

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.10 gal/hr), the maximum coating OC content (6.80 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.03 lb OC/hr limit will be shown by the testing required in E.1.

- b. **Emission Limitation:**  
0.13 tons OC/year from primer coating operation

**Applicable Compliance Method:**

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

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c. **Emission Limitation:**

Group limit of 1.34 tons OC/year from primer coating operation

**Applicable Compliance Method:**

Compliance shall be determined by the recordkeeping specified in section C.2.

d. **Emission Limitation:**

0.04 lbs OC/hour from topcoat coating operation

**Applicable Compliance Method:**

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.10 gal/hr), the maximum coating OC content (7.20 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.04 lb OC/hr limit will be shown by the testing required in E.1.

e. **Emission Limitation:**

0.18 tons OC/year from topcoat coating operation

**Applicable Compliance Method:**

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

f. **Emission Limitation:**

Group limit of 1.42 tons OC/year from topcoat coating operation

**Applicable Compliance Method:**

Compliance shall be determined by the recordkeeping specified in section C.3.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound from emissions units K004, K005, K006, K007, and K008 contained in PTI 03-13512 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

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Emissions Unit ID: **K006**

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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 new permit to install.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Chain on edge coating operation #1. Operation consists of emissions unit applying primer coating and a topcoat within one machine.	OAC rule 3745-21-09-(U)(2)(e)(iii)	See A.I.2.a.
	OAC rule 3745-31-05(A)(3)	Use of regenerative thermal oxidizer (RTO) (see A.1.2.b)  <u>Emissions from Primer Coating Operation</u> 0.07 lb organic compounds (OC)/hour, 0.31 ton OC/year;  Group Limit- 1.34 ton OC/year (see A.I.2.c)  <u>Emissions from Topcoat Coating Operation</u> 0.07 lb OC/hour, 0.31 ton OC/year;  Group Limit- 1.42 ton OC/year (see A.I.2.d)

**2. Additional Terms and Conditions**

- 2.a The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The BAT determination was made in accordance with a request by the permittee to voluntarily limit allowable emissions of OC to the following federally enforceable

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limitations:

Emissions Unit ID: **K007**

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Emissions Unit ID: **K007**

Primer coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

Topcoat coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

The federally enforceable limitations are based on the use of a regenerative thermal oxidizer with a capture efficiency of 100% and a control device destruction efficiency of 95%.

The permittee has requested federally enforceable limitations for purposes of maintaining non-title V status.

- 2.c** Combined annual OC emissions from primer coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.34 tons per year.
- 2.d** Combined annual OC emissions from topcoat coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.42 tons per year.
- 2.e** For purposes of federal enforceability, emission limitations on OC effectively limit emissions of VOC.

## **B. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations and, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

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Emissions Unit ID: **K007**

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- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation; and

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- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation was more than 50 degrees Fahrenheit below the average temperature during the most recent stack test that demonstrated that the emissions units were in compliance.
2. The permittee shall collect and record the following information each month for primer coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each primer coating employed;
  - b. the number of gallons of each primer coating employed;
  - c. the organic compound content of each primer coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all primer coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all primer coatings, for the calendar year to date, in tons per year.
3. The permittee shall collect and record the following information each month for topcoat coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each topcoat coating employed;
  - b. the number of gallons of each topcoat coating employed;
  - c. the organic compound content of each topcoat coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all topcoat coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all topcoat coatings, for the calendar year to date, in tons per year.

**D. Reporting Requirements**

**Issue**

Emissions Unit ID: **K007**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

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Emissions Unit ID: **K007**

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2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The deviation reports and summaries required by D.1 and D.2 shall be submitted in accordance with the general terms and conditions of this permit.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the primer coating operation and topcoat coating operation group limits associated with emissions units K004, K005, K006, K007, and K008.

#### **E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 3 months of start-up of the emissions unit;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control efficiency requirements;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
  - d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does

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Emissions Unit ID: **K007**

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not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**  
0.07 lbs OC/hour from primer coating operation

**Applicable Compliance Method:**

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (6.80 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.

- b. **Emission Limitation:**  
0.31 tons OC/year from primer coating operation

**Applicable Compliance Method:**

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

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- c. **Emission Limitation:**  
Group limit of 1.34 tons OC/year from primer coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.2.
  
- d. **Emission Limitation:**  
0.07 lbs OC/hour from topcoat coating operation  
  
**Applicable Compliance Method:**  
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (7.20 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.
  
- e. **Emission Limitation:**  
0.31 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.  
  
\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.
  
- f. **Emission Limitation:**  
Group limit of 1.42 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.3.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound from emissions units K004, K005, K006, K007, and K008 contained in PTI 03-13512 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

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**PTI /**

Emissions Unit ID: **K007**

**Issued: To be entered upon final issuance**

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 new permit to install.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Chain on edge coating operation #2. Operation consists of emissions unit applying primer coating and a topcoat within one machine.	OAC rule 3745-21-09-(U)(2)(e)(iii)	See A.I.2.a.
	OAC rule 3745-31-05(A)(3)	Use of regenerative thermal oxidizer (RTO) (see A.1.2.b)  <u>Emissions from Primer Coating Operation</u> 0.07 lb organic compounds (OC)/hour, 0.31 ton OC/year;  Group Limit- 1.34 ton OC/year (see A.I.2.c)  <u>Emissions from Topcoat Coating Operation</u> 0.07 lb OC/hour, 0.31 ton OC/year;  Group Limit- 1.42 ton OC/year (see A.I.2.d)

**2. Additional Terms and Conditions**

- 2.a The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The BAT determination was made in accordance with a request by the permittee to voluntarily limit allowable emissions of OC to the following federally enforceable

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limitations:

Emissions Unit ID: **K008**

**Bridg**

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**Issued: To be entered upon final issuance**

Emissions Unit ID: **K008**

Primer coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

Topcoat coating operations- 0.07 lb OC/hour and 0.31 ton OC/year

The federally enforceable limitations are based on the use of a regenerative thermal oxidizer with a capture efficiency of 100% and a control device destruction efficiency of 95%.

The permittee has requested federally enforceable limitations for purposes of maintaining non-title V status.

- 2.c** Combined annual OC emissions from primer coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.34 tons per year.
- 2.d** Combined annual OC emissions from topcoat coating operations from emissions units K004, K005, K006, K007, and K008 shall not exceed 1.42 tons per year.
- 2.e** For purposes of federal enforceability, emission limitations on OC effectively limit emissions of VOC.

## **B. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations and, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

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Emissions Unit ID: **K008**

**Issued: To be entered upon final issuance**

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation; and

- b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation was more than 50 degrees Fahrenheit below the average temperature during the most recent stack test that demonstrated that the emissions units were in compliance.
2. The permittee shall collect and record the following information each month for primer coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each primer coating employed;
  - b. the number of gallons of each primer coating employed;
  - c. the organic compound content of each primer coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all primer coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all primer coatings, for the calendar year to date, in tons per year.
3. The permittee shall collect and record the following information each month for topcoat coating operations for emissions units K004, K005, K006, K007, and K008 combined:
  - a. the company identification for each topcoat coating employed;
  - b. the number of gallons of each topcoat coating employed;
  - c. the organic compound content of each topcoat coating, in pounds per gallon, as applied;
  - d. the total controlled organic compound emission rate for all topcoat coatings, in tons per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. total controlled organic compound emission rate for all topcoat coatings, for the calendar year to date, in tons per year.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

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Emissions Unit ID: **K008**

**Issued: To be entered upon final issuance**

2. The permittee shall submit summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The deviation reports and summaries required by D.1 and D.2 shall be submitted in accordance with the general terms and conditions of this permit.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the primer coating operation and topcoat coating operation group limits associated with emissions units K004, K005, K006, K007, and K008.

#### **E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 3 months after start-up of the emissions unit;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for OC and the capture efficiency and control efficiency requirements;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for organic compounds, Method 25 or 25a of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
  - d. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency; and
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and

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validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**  
0.07 lbs OC/hour from primer coating operation

**Applicable Compliance Method:**

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (6.80 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.

- b. **Emission Limitation:**  
0.31 tons OC/year from primer coating operation

**Applicable Compliance Method:**

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

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- c. **Emission Limitation:**  
Group limit of 1.34 tons OC/year from primer coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.2.
  
- d. **Emission Limitation:**  
0.07 lbs OC/hour from topcoat coating operation  
  
**Applicable Compliance Method:**  
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.20 gal/hr), the maximum coating OC content (7.20 lbs/gallon coating) and 95% overall control efficiency (100% capture, 95% destruction efficiency). Compliance with the 0.07 lb OC/hr limit will be shown by the testing required in E.1.
  
- e. **Emission Limitation:**  
0.31 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.\* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.  
  
\*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.
  
- f. **Emission Limitation:**  
Group limit of 1.42 tons OC/year from topcoat coating operation  
  
**Applicable Compliance Method:**  
Compliance shall be determined by the recordkeeping specified in section C.3.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound from emissions units K004, K005, K006, K007, and K008 contained in PTI 03-13512 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

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**PTI /**

Emissions Unit ID: **K008**

**Issued: To be entered upon final issuance**

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 new permit to install.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13512 Facility ID: 0388010047

FACILITY NAME Bridgestone APM-RTM Plant

FACILITY DESCRIPTION Fabricated rubber products CITY/TWP Upper Sandusky

SIC CODE 3061 SCC CODE 3-08-999-99 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Index coating operation #1. Operation consists of emissions unit applying primer coating and a topcoat within one machine.

DATE INSTALLED 11/00

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	Attainment				
PM <sub>10</sub>					
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
	Primer Coating Operation	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.34 TPY
	Topcoat Coating Oper.	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.42 TPY
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination** Use of RTO with 95% control efficiency and terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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 X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13512 Facility ID: 0388010047

FACILITY NAME Bridgestone APM-RTM Plant

FACILITY DESCRIPTION Fabricated rubber products CITY/TWP Upper Sanduskv

Emissions Unit ID: **K008**

SIC CODE 3061 SCC CODE 3-08-999-99 EMISSIONS UNIT ID K005

EMISSIONS UNIT DESCRIPTION Index coating operation #2. Operation consists of emissions unit applying primer coating and a topcoat within one machine.

DATE INSTALLED 11/00

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	Attainment				
PM <sub>10</sub>					
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
	Primer Coating Operation	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.34 TPY
	Topcoat Coating Oper.	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.42 TPY
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

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

**Enter Determination** Use of RTO with 95% control efficiency and terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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 X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13512 Facility ID: 0388010047

FACILITY NAME Bridgestone APM-RTM Plant

FACILITY DESCRIPTION Fabricated rubber products CITY/TWP Upper Sanduskv

Emissions Unit ID: **K008**

SIC CODE 3061 SCC CODE 3-08-999-99 EMISSIONS UNIT ID K006

EMISSIONS UNIT DESCRIPTION Robot coating operation. Operation consists of emissions unit applying primer coating and a topcoat within one machine.

DATE INSTALLED 11/00

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	Attainment				
PM <sub>10</sub>					
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
	Primer Coating Operation	0.03 lb/hr	0.13 TPY	0.03 lb/hr	0.13 TPY, combined 1.34 TPY
	Topcoat Coating Oper.	0.04 lb/hr	0.18 TPY	0.04 lb/hr	0.18 TPY, combined 1.42 TPY
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

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

**Enter Determination** Use of RTO with 95% control efficiency and terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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 X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13512 Facility ID: 0388010047

FACILITY NAME Bridgestone APM-RTM Plant

FACILITY DESCRIPTION Fabricated rubber products CITY/TWP Upper Sanduskv

Emissions Unit ID: **K008**

SIC CODE 3061 SCC CODE 3-08-999-99 EMISSIONS UNIT ID K007

EMISSIONS UNIT DESCRIPTION Chain on edge coating operation #1. Operation consists of emissions unit applying primer coating and a topcoat within one machine.

DATE INSTALLED 11/00

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	Attainment				
PM <sub>10</sub>					
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
	Primer Coating Operation	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.34 TPY
	Topcoat Coating Oper.	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.42 TPY
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

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

**Enter Determination** Use of RTO with 95% control efficiency and terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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 X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

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PTI Num

FACILITY

Emissions Unit ID: **K008**

FACILITY DESCRIPTION Fabricated rubber products

CITY/TWP Upper Sandusky

SIC CODE 3061

SCC CODE 3-08-999-99

EMISSIONS UNIT ID K008

EMISSIONS UNIT DESCRIPTION Chain on edge coating operation #2. Operation consists of emissions unit applying primer coating and a topcoat within one machine.

DATE INSTALLED 11/00

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	Attainment				
PM <sub>10</sub>					
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment				
	Primer Coating Operation	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.34 TPY
	Topcoat Coating Oper.	0.07 lb/hr	0.31 TPY	0.07 lb/hr	0.31 TPY, combined 1.42 TPY
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

**Enter Determination** Use of RTO with 95% control efficiency and terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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 X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13512 Facility ID: 0388010047

FACILITY NAME Bridgestone APM-RTM Plant

FACILITY DESCRIPTION Fabricated rubber products CITY/TWP Upper Sandusky

Emissions Unit ID: **K008**

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](mailto: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 checked="" type="checkbox"/>	0313512c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.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

NONE

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 03-13512

**A. Source Description**

Bridgestone APM Company has proposed to install 5 new coating operations. All emissions units are subject to OAC rule 3745-21-09(U)(2)(e)(iii). All emissions will be vented to a common RTO that will be 95% efficient in reducing OC emissions. The tons OC per year facility-wide PTE falls below the 100 tons per year threshold for Title V applicability.

**B. Facility Emissions and Attainment Status**

The facility maintains a Non-Title V status. Wyandot county is attainment for all criteria pollutants.

**C. Source Emissions**

**POTENTIAL EMISSIONS:** Without any restrictions, the facility would become a Title V facility.

**RESTRICTING POTENTIAL EMISSIONS:** The facility requested that emissions limits be based on a destruction efficiency of 95% from a RTO that will be installed for controlling OC emissions below Title

**70 NEW SOURCE REVIEW FORM B**

PTI Number: 03-13512

Facility ID: 0388010047

FACILITY NAME Bridgestone APM-RTM Plant

FACILITY DESCRIPTION Fabricated rubber products

CITY/TWP

Upper Sandusky

Emissions Unit ID: **K008**

**V levels.**

**D. Conclusion**

**With the annual emissions for all five emissions units restricted by the use of an RTO in this permit, the OC emissions will be below the 100 ton per year Title V threshold. Therefore, the facility will not be considered Title V.**

**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**

**OC**

**2.76**