



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

4/12/2013

Certified Mail

Paul Clark
31 Inc.
100 Enterprise Drive
Newcomerstown, OH 43832

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0679000284
Permit Number: P0112915
Permit Type: OAC Chapter 3745-31 Modification
County: Tuscarawas

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-SEDO; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

31 Inc. owns and operates an existing tire repair materials manufacturing facility located in Newcomerstown, Ohio (Tuscarawas County). This FEPTIO covers existing equipment in operation at the facility including two nylon string coating lines (emissions units R001 and R002) and a dip/spray process used to coat molded rubber plugs (emissions unit R003).

3. Facility Emissions and Attainment Status:

Tuscarawas County is in attainment or unclassifiable for all criteria pollutants. Emissions units R001 and R002 are currently subject to federally enforceable restrictions that limit VOC emissions to below major Title V source levels at 81.5 tons per year. However, in the attached FEPTIO, this restriction is being updated to also cover emissions unit R003 (currently permitted at PTE at 7.0 tons per year) in the facility-wide restriction and increase the facility-wide allowable VOC emissions from these three emissions units to 98.0 tons per year. Potential uncontrolled VOC emissions from de minimis and permit exempt sources at the facility are less than one ton per year.

4. Source Emissions:

With the final issuance of this FEPTIO, 31 Inc. will be required to comply with federally enforceable restrictions on material usage sufficient to ensure that facility-wide emissions from emissions units R001-R003 do not exceed 98.0 tons of VOC per rolling, 12-month period. As a result, the VOC emissions from this facility will legally be restricted to below 100 tons per year and 31 Inc. will not be subject to Title V operating permit requirements. The only hazardous air pollutants (HAPs) emitted are from the use of trichloroethylene cleanup solvent in emissions unit R003 process, but the uncontrolled potential to emit for HAPs are below the major source thresholds of 10 TPY (highest individual HAP) and 25 TPY (total HAPs) in the absence of federally enforceable operating restrictions, so no emissions limitations or recordkeeping and reporting requirements are necessary for HAPs from the facility to ensure Title V requirements are avoided.

5. Conclusion:

This permit authorizes up to 98.0 tons of VOC emissions per rolling, 12-month period from emissions units R001-R003, combined. This facility-wide VOC emissions limit is based on limiting the usage of coating and cleanup materials sufficient to ensure that actual VOC emissions from these emissions units never exceed 98.0 tons per rolling, 12-month period as demonstrated by the calculations in the monitoring section of the attached FEPTIO. Compliance with the operational restrictions will be documented by performing monthly and rolling, 12-month VOC emissions calculations based on material throughputs of the various coatings used, the VOC content of each coating, as applied, the maximum cleanup solvent usage rate less solvent disposed and the maximum VOC content of the cleanup solvents used. The operational restrictions, emissions limits, monitoring and record keeping requirements in this permit are sufficient to limit the federally enforceable potential to emit for VOC from emissions units R001-R003 to 98.0 tons per rolling, 12-month period. With potential uncontrolled VOC emissions from de minimis and permit exempt sources



at the facility below one ton per year, the restrictions on VOC emissions from emissions units R001-R003 are sufficient to ensure the facility is not subject to Title V requirements. Potential emissions of HAPs from the facility are below the major source thresholds, so no additional monitoring, recordkeeping or reporting requirements are necessary to ensure that the major source thresholds for individual and total HAPs are not exceeded.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	98.0
Individual HAP (trichloroethylene)	1.01
Total HAP	1.01

PUBLIC NOTICE

4/12/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

31 Inc.

100 Enterprise Drive,
Newcomerstown, OH 43832

Tuscarawas County

FACILITY DESC.: All Other Rubber Product Manufacturing

PERMIT #: P0112915

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 modification to increase synthetic minor limitations on facility-wide VOC emissions and renewal of operating permits for two string coating lines and one dip and spray coating process for molded rubber plugs

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kimbra Reinbold, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
31 Inc.**

Facility ID:	0679000284
Permit Number:	P0112915
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	4/12/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
31 Inc.

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Draft Permit-to-Install and Operate

31 Inc.

Permit Number: P0112915

Facility ID: 0679000284

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0679000284
Application Number(s): A0046837, A0046872
Permit Number: P0112915
Permit Description: Chapter 31 modification to increase synthetic minor limitations on facility-wide VOC emissions and renewal of operating permits for two string coating lines and one dip and spray coating process for molded rubber plugs
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/12/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

31 Inc.
100 Enterprise Drive
Newcomerstown, OH 43832

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112915

Permit Description: Chapter 31 modification to increase synthetic minor limitations on facility-wide VOC emissions and renewal of operating permits for two string coating lines and one dip and spray coating process for molded rubber plugs

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

Emissions Unit ID:	R003
Company Equipment ID:	Drying Oven
Superseded Permit Number:	06-06846
General Permit Category and Type:	Not Applicable

Group Name: String coating lines

Emissions Unit ID:	R001
Company Equipment ID:	Coating Line # 1
Superseded Permit Number:	06-5328
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Coating Line # 2
Superseded Permit Number:	06-5328
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

31 Inc.

Permit Number: P0112915

Facility ID: 0679000284

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

31 Inc.

Permit Number: P0112915

Facility ID: 0679000284

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) 2.a)(1), 3.a), 4.a), 5.a) and 6.a)(1)

2. Applicable Emissions Limitations and/or Control Requirements

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
(1)	OAC rule 3745-31-05(D) Synthetic minor restriction to avoid Title V requirements for VOC emissions	Volatile organic compound (VOC) emissions from emissions units R001-R003, combined, shall not exceed 98.0 tons per rolling, 12-month period. See 3.a) below.

3. Operational Restrictions

a) The permittee has requested a federally enforceable limitation on VOC emissions for the purposes of limiting potential to emit to avoid Title V requirements. Therefore, the maximum material usage for emissions units R001-R003, combined, shall not cause VOC emissions to exceed 98.0 tons as a rolling, 12-month summation, as demonstrated by the following calculations:

(1) Monthly string line coating and cleanup emissions (R001 and R002):

$$X = \sum_{i=1}^n (G_c)(VOC_c) + (G_{cl})(VOC_{cl}) \times 1 \text{ ton}/2,000 \text{ lbs}$$

Where:

X = R001 and R002 VOC emissions, in tons per month;

G_c = amount of material in each batch of coating applied, in gallons;

VOC_c = VOC content of each batch of coating applied, in pounds of VOC per gallon;

n = number of batches of coating applied;

G_{cl} = amount of cleanup material used minus the cleanup material disposed, in gallons; and

VOC_{cl} = VOC content of cleanup material used, in pounds of VOC per gallon.



- (2) Monthly molded rubber plug coating and cleanup emissions (R003):

Y = sum from i=1 to n of (Gc)(VOCc) + (Gcl)(VOCcl) X 1 ton/2,000 lbs

Where:

Y = R003 VOC emissions, in tons per month;

Gc = amount of each type of coating applied, in gallons;

VOCc = VOC content of each type of coating applied, in pounds of VOC per gallon;

n = number of coatings applied;

Gcl = amount of cleanup material used minus the cleanup material disposed, in gallons; and

VOCcl = VOC content of cleanup material used, in pounds of VOC per gallon.

- (3) Total VOC Emissions:

sum from i=1 to n of (X + Y) is <= 98.0 tons VOC, as a rolling 12-month summation

Where:

n = months in the rolling, 12-month period.

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

The potential to emit from all de minimis and exempt sources at the facility, combined, is less than 1.0 ton of VOC per year.

4. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall collect and record the following information each month for emissions units R001-R003:

- (1) the number of batches of coating applied in EUs R001 and R002;
(2) the amount of coating in each batch of coating applied in EUs R001 and R002, in gallons
(3) the VOC content of each batch of coating applied, in pounds of VOC per gallon;
(4) the amount of cleanup material used in EUs R001 and R002, minus the cleanup material disposed, in gallons;
(5) the VOC content of the cleanup material used, in pounds of VOC per gallon;
(6) the number of coatings applied in EU R003;



- (7) the amount of each type of coating applied in EU R003, in gallons;
- (8) the VOC content of each coating applied in EU R003, in pounds of VOC per gallon;
- (9) the amount of cleanup material used in EU R003, minus the cleanup material disposed, in gallons;
- (10) the VOC content of the cleanup material used in EU R003, in pounds of VOC per gallon;
- (11) the VOC emissions, in tons, as calculated based on the equations in 3.a)(1) and (2); and
- (12) the rolling, 12-month summation of the total VOC emissions, in tons, as calculated based on the equation in 3.a)(3).

5. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. VOC emissions from emissions units R001-R003 shall not exceed 98.0 tons per rolling, 12-month period.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

6. Testing Requirements

- a) Compliance with the emissions limitations and/or control requirements specified in 2.a)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - (1) Emissions Limitation:
VOC emissions from emissions units R001-R003, combined, shall not exceed 98.0 tons per rolling, 12-month period.



Draft Permit-to-Install and Operate

31 Inc.

Permit Number: P0112915

Facility ID: 0679000284

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limitation for VOC shall be demonstrated by the recordkeeping requirements in 4.a).

7. Miscellaneous Requirements

a) None.



Draft Permit-to-Install and Operate

31 Inc.

Permit Number: P0112915

Facility ID: 0679000284

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R003, Molded rubber plug coating process

Operations, Property and/or Equipment Description:

Dip or spray coating process used to apply adhesives and sealants to molded rubber plugs; Chapter 31 modification to increase maximum coating use rate to 8,760 gallons per year, require 100% transfer or capture of overspray, and address trichloroethylene emissions from parts cleaning; supersedes PTI No. 06-06846 issued on May 21, 2002

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3)-(6) and e)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from coating and cleanup material use shall not exceed 19.76 tons per rolling, 12-month period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall ensure 100% transfer or capture of all solids generated when coatings are sprayed in this emissions unit.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of each coating applied, in gallons;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the amount of cleanup material used minus the amount of cleanup material disposed, in gallons;
 - d. the VOC content of the cleanup material used, in pounds per gallon;
 - e. the total VOC emissions from all coatings applied and cleanup materials used, calculated as the sum of d)(1)a. X d)(1)b. and d)(1)c. X d)(1)d., in pounds; and
 - f. the rolling, 12-month summation of the total VOC emissions, in tons, calculated as the sum of d)(1)e. for the current month and each of the preceding eleven months.
- (2) The permittee shall maintain records that document any time periods when 100% transfer or capture of all solids generated when coatings are sprayed in this emissions unit is not maintained.
- (3) The federally enforceable permit-to-install and operate (FEPTIO) modification application for emissions unit R003 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or



ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year):

Toxic Contaminant: Trichloroethylene

TLV (mg/m³): 268.7

Maximum Hourly Emission Rate (lbs/hr): 0.28

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 253.5

MAGLC (ug/m³): 6,397.9

The permittee has demonstrated that emissions of trichloroethylene from emissions unit R003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
VOC emissions from coating and cleanup material use shall not exceed 19.76 tons per rolling, 12-month period.

Applicable Compliance Method:
Compliance with the rolling, 12-month emissions limitation for VOC shall be demonstrated by the recordkeeping requirements in d)(1).

If required, formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group - String coating lines: R001, R002

EU ID	Operations, Property and/or Equipment Description
R001	String Coating Line # 1 – Coating dip tank and steam-heated drying oven used to coat nylon string; Chapter 31 modification to increase maximum coating use rate to 11.5 gallons per hour and maximum cleanup solvent use rate of 35 gallons per year; supersedes PTI No. 06-5328 issued on May 13, 1998
R002	String Coating Line # 2 – Coating dip tank and steam-heated drying oven used to coat nylon string; Chapter 31 modification to increase maximum coating use rate to 11.5 gallons per hour and maximum cleanup solvent use rate of 35 gallons per year; supersedes PTI No. 06-5328 issued on May 13, 1998

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The emissions limitation required by this rule is equivalent to the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic minor restriction to avoid Title V requirements for VOC emissions	See Section B.2.a).
c.	OAC rule 3745-21-09(G)	The VOC content of the coatings employed shall not exceed 2.9 pounds per gallon, as applied, excluding water and exempt solvents, as a daily volume-weighted average.



- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line when metal parts are coated:
 - a. the name and identification number of each batch of coating, as applied;
 - b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each batch of coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^n C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi}) / \sum L_{Ci} (V_{Si} + V_{VOCi})$$

Where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

D_C = density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.



W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content is per day and not included in the calculation.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Ohio EPA, Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 45 days after the exceedance occurs.



f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC content of the coatings employed shall not exceed 2.9 pounds per gallon, as applied, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance with the coating content limitation for VOC shall be demonstrated by the recordkeeping requirements in d)(1).

If required, formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.