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Facility Name: **Cooper Tire and Rubber**

Application Number: **03-1229**

Date: **Draft PTI (date will be entered upon final issuance)**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code

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(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### BEST AVAILABLE TECHNOLOGY

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

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Cooper Tire and Rubber** located in **Wood** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	R008 (Mod) Cont'd	P014 (Mod)		
			R011 (Mod)	
		P014 (Mod) Cont'd		
		P012 (Mod)	R011 (Mod) Cont'd	

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R011 (Mod) Cont'd	P016 (Mod) Cont'd	R012 (Mod) Cont'd	P021 (Mod) Cont'd	Source Identification <u>Description</u>
P018 (Mod)	R012 (Mod)		P019 (Mod)	Flock line no. 1 - adhesive booth, drying conveyor, and flocking booth
		P021 (Mod)		
P016 (Mod)				

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	Flock line no. 1 super jet oven, oven no. 1, and cooling trough		Flock line no. 2 - hot air cure oven no. 2 and cooling conveyor	Flock line no. 3 - adhesive booth, drying conveyor, and flocking booth
Flock line no. 1 - hot air cure oven no. 2 and cooling conveyo r	Flock line no. 2 - adhesive booth, drying conveyor, and flocking booth		Flock line no. 2 super jet oven, oven no. 1, and cooling trough	

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
	Flock line no. 1 super jet oven, oven no. 1, and cooling trough	<u>BAT Determination</u>		Compliance with the emissions limits and terms and conditions of this permit
Flock line no. 3 - hot air cure oven no. 2 and cooling conveyo r		Compliance with the emissions limits, and terms and conditions of this permit		Compliance with the emissions emission limits, limits, and terms and terms and conditions of conditions of this permit this permit

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	nce with emission limits, and terms and conditions of this permit	Compliance with the emissions limits, and terms and conditions of this permit		Compliance with the emissions limits and terms and conditions of this permit
	Compliance with the emissions limits and terms and conditions of this permit		Compliance with emission limits, and terms and conditions of this permit	

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		3745-31-05		
Applicable Federal & OAC Rules	3745-31-05		3745-31-05 3745-17-07 3745-17-11	3745-31-05 3745-21-07 (G) (9) (g)
3745-31-05				
3745-21-07		3745-31-05		
(G) (9) (g)				3745-31-05
	3745-31-05			
3745-31-05			3745-31-05	
				3745-31-05
3745-31-05	3745-31-05	3745-31-05	3745-31-05	
3745-17-11	3745-21-07	(G) (9) (g)		
3745-17-07	(G) (9) (g)			
		3745-31-05		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	3745-31-05		Permit Allowable Mass Emissions and/or Control/Usage Requirements	R008 and P013 shall not exceed 7.3 tons/year, based on a rolling 12 month summation.
3745-31-05 3745-21-07 (G) (9) (g)	3745-31-05	3745-31-05	The combined OC emissions from R008 and P014 shall not exceed 77.1 pounds/day.	The VOC content of each adhesive employed shall not exceed 3.6 pounds/gallon of adhesive excluding water and exempt solvents.
3745-31-05			The emissions of xylene and MEK from the adhesive booth shall not exceed 3.30 pounds/hour and 3.04 pounds/hour respectively.	See Additional Special Terms and Conditions.
3745-31-05 3745-17-07 3745-17-11	3745-31-05 (G) (9) (g)		The PM emissions from the flocking booth shall not exceed 0.1 pound/hour, 0.44 ton/year, and twenty percent as a six minute average, except as provided by	The combined OC emissions from R008 and P014 shall not exceed 77.1 pounds OC/day. The total OC emissions from R008 and P014 shall not exceed 7.3 tons/year, based upon a rolling 12 month summation.
	3745-31-05		The total OC emissions from	See Additional Special Terms

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and Condi ons.  The emissio ns of carbon disulfi de shall not exceed 0.51 pound/h our.  The OC emissio ns shall not exceed 1.10 tons OC/year (* based upon a rolling 12 month summati on.  See Additio nal Special	Terms and Conditions.  The combined OC emissions from R011 and P018 shall not exceed 77.1 pounds/day.  The emissions of xylene and MEK from the adhesive booth shall not exceed 3.30 pounds/hour and 3.04 pounds/hour respectively.  The PM emissions from the flocking booth shall not exceed 0.1 pound/hour, 0.44 ton/year, and twenty percent as a six minute average, except as provided by	rule.  The total OC emissions from R011 and P018 shall not exceed 7.3 tons/year, based on a rolling 12 month summation.  The VOC content of each adhesive employed shall not exceed 3.6 pounds/gallon of adhesive excluding water and exempt solvents.  See Additional Special Terms and Conditions.  The combined OC emission from R011 and P018 shall not exceed 77.1 pounds OC/day.  The total OC emissions from R011 and P018 shall not exceed 7.3 tons/year, based on a rolling 12 month summation.  See Additional	Special Terms and Conditions.  The emissions of carbon disulfide shall not exceed 0.51 pound/hour.  The OC emissions shall not exceed 1.10 tons OC/year (* based upon a rolling 12 month summation.  See Additional Special Terms and Conditions.  The combined OC emissions from R012 and P021 shall not exceed 77.1 pounds/day.  The emissions of xylene and MEK from the adhesive booth shall not exceed 3.30 pounds/hour and 3.04 pounds/hour respectively.  The PM emissions from the flocking booth	shall not exceed 0.1 pound/hour, 0.44 ton/year, and twenty percent as a six minute average, except as provided by rule.  The total OC emissions from R012 and P021 shall not exceed 7.3 tons/year, based on a rolling 12 month summation.  The VOC content of each adhesive employed shall not exceed 3.6 pounds/gallon of adhesive excluding water and exempt solvents.  See Additional Special Terms and Conditions.  The combined OC emissions from R012 and P021 shall not exceed 77.1 pounds OC/day.

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<p>The total OC emissions from R012 and P021 shall not exceed 7.3 tons/year, based upon a rolling 12 month summation.</p>	<p>de shall not exceed 0.51 pound/hour. The OC emissions shall not exceed 1.61 tons OC/year (*) based upon a rolling 12 month summation. See Additional Special Terms and Conditions.</p>			
<p>See Additional Special Terms and Conditions.</p>				
<p>The emissions of carbon disulfi</p>				

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- \* Based on an emission factor  $8.25 \times 10^{-04}$  pounds of VOC/pound of rubber cured from the Rubber Manufacturers Association "Emission Factors Development Project" Manual dated September, 1996.

#### SUMMARY

##### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds (OC)	25.71
Particulate Matter (PM)	0.44

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

#### MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be

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reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **Introduction**

Cooper Engineered Products (hereinafter referred to as "permittee") submitted a permit to install application for modifications to Flock Lines no. 1 to no.3 at the Bowling Green facility located at 1175 North Main. This permit to install (PTI No. 03-1229) will allow for increased emissions limits on Extruders, Super Jet Oven, Oven no. 1, Tear Strip, Cooling Trough, Surface Treat, Adhesive Booth, Drying Conveyor, Flocking Booth, Oven no. 2, Cooling Conveyor and Cutter for each line.

The following notations are used through these terms and conditions:

	*	**	***
Flock Line #1	R008	P014	P012
Flock Line #2	R011	P018	P016
Flock Line #3	R012	P021	P019

#### **A. Applicable Emission Limitations and/or Control Requirements**

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1. This permit allows the use of the coatings and rubber compound material specified by the permittee in the application for PTI number 03-1229. In conjunction with the best available technology requirements of OAC Rule 3745-31-05, the xylene, MEK, and carbon disulfide organic compound emission limitations(s) specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on the following coating material data formulation data, and emission factor of  $6.43 \times 10^{-04}$  pound of carbon disulfide/pound of rubber cured from the Rubber Manufacturers Association manual entitled Emissions Factors Development Project, dated September 1996, and the design parameters of the emission unit's exhaust system as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model, Version 95250 and a comparison of the predicted 1-hour maximum ground level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

#### **Organic Compounds**

**Pollutant: Xylene (Stack #194)**

**TLV (ug/m3): 434,000**

**Maximum Hourly Emission Rate (lbs/hr): 3.3**

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 353.3**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333**

**Pollutant: MEK**

**TLV (ug/m3): 590,000**

**Maximum Hourly Emission Rate (lbs/hr): 3.04**

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 325.5**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,048**

**Pollutant: Carbon Disulfide (Stack #195)**

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**TLV (ug/m3): 31,000**

**Maximum Hourly Emission Rate (lbs/hr): 0.51**

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 39.8**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 738.1**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-1229 and the operating permit:

- a. any changes in the composition of the coatings, or rubber compound material, or the use of new coatings, cleanup or rubber compound materials, as specified by the permittee in the application for PTI 03-1229 that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
- d. any change in the composition of the coatings or rubber compound materials, or use of new coatings, cleanup or rubber compound materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

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2. The OC emissions from emissions units (\*) and (\*\*) are generated from the application of coating (adhesive). Emissions from rubber curing are based on the emission factor of  $8.25 \times 10^{-04}$  lbs of VOC/lb of rubber cured, which was obtained from the Rubber Manufacturers Association "Emission Factors Development Project" Manual dated September, 1996. All OC emissions from rubber curing are assumed to be emitted from (\*\*\*)

### **B. Operational Restrictions**

1. The combined emissions of organic compounds from emissions unit (\*) and (\*\*) shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of Organic Compounds (Pounds)</u>
1	1.8
1-2	2.3
1-3	2.8
1-4	3.1
1-5	3.6
1-6	4.1
1-7	4.6
1-8	5.1
1-9	5.6
1-10	6.1
1-11	6.6
1-12	7.3

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

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2. The maximum annual production rate for the emissions unit P019 (\*\*\*) , shall not exceed 1,950 tons of rubber cured per year, based upon a rolling 12-month summation of the production rates.

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

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Production (Tons Rubber Cured)</u>
1	488
1-2	621
2-3	754
3-4	887
4-5	1020

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Production (Tons Rubber Cured)</u>
5-6	1153
6-7	1286
7-8	1419
8-9	1552
9-10	1685
10-11	1818
11-12	1950

After the first 12 months of operation following the issuance of the permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of monthly production rates.

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

1. The permittee shall collect and record the following information each week for emissions units (\*) and (\*\*):
  - a. the company identification for each coating material employed;

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- b. the number of gallons of each coating material employed;
- c. the organic compound content of each coating material, in pounds per gallon;
- d. the volatile organic compound content of each coating, excluding water and exempt solvents, in pounds per gallon;
- e. the organic compound emission rate for each coating (assuming all solvent in the coating is emitted), in pounds per week;
- f. the total organic compound emission rate for all coatings, in pounds per week;
- g. the total number of days the emission units were in operation; and,
- h. the average daily organic compound emission rate, calculated by dividing the weekly emissions by the number of days the emissions units were in operation, i.e., (f)/(g) from above, in pounds per day (average).

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

- 2. The permittee shall collect and record the following each month for emissions units (\*) and (\*\*):
  - a. the total OC emissions for the month in tons;
  - b. during the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition B.1.); and,
  - c. beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition B.1.).

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3. The permittee shall collect and record the following information each month for emissions unit (\*\*), for the curing of the extruded rubber:
  - a. the monthly throughput of rubber cured, in pound per month;
  - b. the OC emission rate from the curing of rubber, as calculated in accordance with Additional Special Term and Condition: **E: Emission Calculation Requirements**;
  - c. during the first 12 calendar months of operation under this permit, the total cumulation monthly mass of rubber cured (per Additional Special Term and Condition B.2. and 3.); and,
  - d. beginning after the first 12 calendar months of operation under this permit, the total amount of rubber cured per rolling, 12-month period (per Additional Special Term and Condition B.2. and 3.)

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions units (\*) and (\*\*) which include the following information:
  - a. an identification of each week during which the average daily organic compound emissions from emissions unit (\*) and (\*\*) exceeded 77.1 pounds per day, and the actual average daily organic compound emissions for each such day;
  - b. an identification of all exceedances of the rolling, 12-month emission limitation for organic compounds from emissions units (\*) and (\*\*) and, for the first 12 calendar months of operation following the issuance of the permit, all exceedances of the maximum allowable cumulative emission levels; and,
  - c. an identification of all exceedances of the VOC content limitation of 3.6 pounds per gallon, excluding water and exempt solvents.

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2. The permittee shall submit deviation (excursion) reports for emissions unit (\*\*\*) which include the following information: an identification of all exceedances of the rolling, 12-month production rate limitation for the cured rubber and, for the first 12 calendar months of operation following the issuance of the permit, all exceedances of the maximum allowable cumulative production levels.
3. 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 Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio, 43402. 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.)
4. The permittee shall submit annual reports (emission fee reports) summarizing the total OC emissions from emissions units (\*) and (\*\*), and the total amount of rubber cured for emissions unit (\*\*\*). These reports shall be submitted by April 15 of each calendar year and shall address the previous calendar year.

#### **E. Emission Calculation Requirements**

1. The company shall calculate the OC emission rate from the curing of rubber in (\*\*\*) in accordance with the following equation:

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$$E = FM$$

Where: E is the OC emissions, in pounds  
 F is the emission factor  $8.25 \times 10^{-4}$  lbs of  
 OC per pound of rubber cured

M is the pounds of rubber cured \*\*\*\*

\*\*\*\* It is being assumed that all rubber  
 curing emissions are emitted from  
 (\*\*\*) .

## **F. Compliance Methods/Testing Requirements**

### 1. OC and VOC Content

U.S. EPA Method 24 shall be used to determine the OC and VOC content of the adhesives. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall also notify the Administrator of the U.S. EPA and shall use the formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 2. Visible Emissions

Visible emissions readings shall be performed using Method 9 of 40 CFR Part 60, Appendix A.

### 3. Mass Emissions and Production

a. Compliance with the OC emission limitation of 77.1 pounds OC/day shall be determined by the recordkeeping requirements in C.1.

b. Compliance with the OC emission limitation of 7.3 tons/year shall be determined by the recordkeeping requirements in C.1 and C.2.

c. Compliance with the OC emission limitation of 1.1 and 1.61 tons/year shall be determined by the recordkeeping requirements in C.3

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- d. If required, an emission test shall be performed in accordance with OAC Rule 3745-17-03(B)(10) to demonstrate compliance with the allowable hourly particulate emission rate of 0.1 pound per hour.
- e. Compliance with the annual particulate emission limit of 0.44 ton per year shall be determined by multiplying the allowable PM emission rate of 0.1 pound per hour by the actual hours of operation during the calendar year, and dividing by 2000.

**G. Miscellaneous Requirements**

- 1. None.