



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/20/07

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77
permit**

02-78-00-0013
Denman Tire Corporation
Danny Willett
400 Diehl South Road
Leavittsburg, OH 44430

Dear Danny Willett:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northeast District Office.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Northeast District Office
Pennsylvania
West Virginia



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 04/20/07

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 02-78-00-0013 to:

Denman Tire Corporation
400 Diehl South Road
Leavittsburg, OH 44430

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include B001 (Coal-Fired Boiler - Springfield), K002 (Green Tire Coating - Grader), K003 (Tire Bead Dipping), (Solvent-Based), K004 (Undertread Cementing), P002 (#9 Banbury Mixer), P007 (3 Blast Booths), P008 (#11 Banbury Mixer), and P009 (Manual Tire Tackifier).

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
 - b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.
- (Authority for term: OAC rule 3745-77-07(F))*

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. 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.

3. 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.

4. 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).

5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations

occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

K001 - Green Tire Coating - Sickle Lube;
P003 - White Sidewall Buffer;
P010 - Manual Tread End Cement;
T001 - 10,000-gallon Solvent Tank;
T002 - 25,000-gallon Oil Tank;
T003 - 25,000-gallon Oil Tank;
Z001 - Tire Curing Operations;
Z002 - Calendering Operations;
Z003 - Cement Room Adhesive Manufacturing;
Z004 - Extruding Operation;
Z005 - Tire Repair Booth;
Z006 - Tire Repair Booth;
Z007 - Tire Repair Booth;
Z008 - Natural Gas Fired Boiler (6.7 mmBtu/hr);
Z009 - Natural Gas Fired Boiler (6.7 mmBtu/hr);
Z010 - Natural Gas Fired Boiler (6.7 mmBtu/hr);
Z011 - Tuber Breakdown Mill;
Z012 - Tuber Breakdown Mill;
Z013 - Tuber Breakdown Mill;
Z014 - Calender Breakdown Mill;
Z015 - Calender Breakdown Mill;
Z016 - Final Finish Label Cementing;
Z017 - Drag Tire Lettering Spray Bench Hood;
Z018 to Z037 - Curing Presses (206-224, 302);
Z038 to Z061 - Curing Presses (101-124); and
Z062 to Z072 - Curing Presses (400-410).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

2. The following insignificant emissions units are affected emissions sources that have HAP emissions:

K001 - Green Tire Coating;
P010 - Manual Tread End Cement;
Z005 - Tire Repair Booth;
Z006 - Tire Repair Booth;
Z007 - Tire Repair Booth;
Z016 - Final Finish Label Cementing; and
Z017 - Drag Tire Lettering Spray Bench Hood.

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. Emissions of each HAP listed in Table 16 of 40 CFR Part 63, Subpart XXXX, from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units K002, K003, K004, and P009, combined, shall not exceed 2 lbs per ton of total cements and solvents.

[Authority for term: 40 CFR Part 63, Subpart XXXX - Table 1, OAC rule 3745-77-07(C)(1), and OAC rule 3745-77-07(A)(13)]

A. State and Federally Enforceable Section (continued)

4. Emissions of each HAP not listed in Table 16 of 40 CFR Part 63, Subpart XXXX, from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units K002, K003, K004, and P009, combined, shall not exceed 20 lbs per ton of total cements and solvents.

[Authority for term: 40 CFR Part 63, Subpart XXXX - Table 1, OAC rule 3745-77-07(C)(1), and OAC rule 3745-77-07(A)(13)]

5. The permittee must keep the following records to show continuous compliance with the emission limitations specified in section A.3 and A.4 of Part II of this permit:

a. the permittee shall maintain records showing lists of each cement and solvent, as purchased, and the name of the supplier or manufacturer of each cement and solvent; and

b. the permittee shall maintain records of test results indicating the mass percent of each HAP for each cement and solvent. The permittee shall use EPA Method 311 (40 CFR Part 60, Appendix A), or an approved alternative method, for determining the HAP content of each cement and solvent.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

6. In accordance with 63.6011 of 40 CFR, the permittee must keep records of each notification and report submitted to comply with MACT Subpart XXXX, including all documentation supporting any Initial Notification or Notification of Compliance Status that submitted, according to the requirements in 63.10(b)(2)(xiv).

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

7. In accordance with 63.6012 of 40 CFR, the permittee must:

a. maintain records in a form suitable and readily available for expeditious review;

b. keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report or record; and

c. keep each record on site for at least two years after the date of each occurrence, measurements, maintenance, corrective action, report or record. The records can be kept off site for the remaining three years.

[Authority for the term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

B. State Only Enforceable Section

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal-Fired Boiler - Springfield (B001)

Activity Description: Coal-Fired Boiler - 33,000 lbs steam/hr input - Springfield boiler.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Coal Fired Boiler Springfield Boiler (B001)	OAC rule 3745-17-07(C) 40 CFR 52.1870(c)(65)	See section A.1.2.a below.
	OAC rule 3745-17-10	Particulate emissions (PE) shall not exceed 0.28 lb/mmBtu of actual heat input.
	OAC rule 3745-18-84(B)	Sulfur dioxide (SO ₂) emissions shall not exceed 5.0 lbs/mmBtu of actual heat input.
	OAC rule 3745-35-07(B)	See sections A.1.2.b and A.1.2.c below.

2. Additional Terms and Conditions

- Pursuant to the provisions of OAC rule 3745-17-07(C), the permittee is hereby granted the following equivalent visible particulate emission limitation for this emissions unit in lieu of the 20 percent opacity limitation specified in OAC rule 3745-17-07(A)(1)(a).

Except as otherwise provided in OAC rule 3745-17-07(A)(1)(b) through (A)(3), the permittee shall not cause or allow the discharge into the ambient air from any stack associated with this emissions unit any air contaminant of a shade or density greater than 35 percent opacity, as a 6-minute block average.

Per OAC rule 3745-17-07(A)(3), this emissions unit is exempt from the above opacity limitation for a period of not more than three hours from the moment of start-up; for a period of not more than three hours during shut down; during intermittent soot-blowing and ash removal operations, providing a daily record documenting the date, the beginning and ending times for all intermittent soot blowing and ash removal operations is maintained; and for a period not to exceed thirty minutes for the commencement of increased coal firing from a banked condition.

2. Additional Terms and Conditions (continued)

2.b This permit establishes federally enforceable limitations on annual coal heat content demand and on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (Subpart DDDDD) regulations.

Cumulative coal heat content demand from this emissions unit shall not exceed 300,000 mmBtu per year, based upon a rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the annual coal heat content demand as specified in the following table:

Maximum allowable Cumulative Coal Heat Content Demand (mmBtu):

Month(s) Heat Input Demand Limitation

1-1	25,000
1-2	50,000
1-3	75,000
1-4	100,000
1-5	125,000
1-6	150,000
1-7	175,000
1-8	200,000
1-9	225,000
1-10	250,000
1-11	275,000
1-12	300,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual heat input demand shall be based upon a rolling, 12-month summation of the monthly heat input demand.

2. Additional Terms and Conditions (continued)

2.c This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (Subpart DDDDD) regulations.

Annual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined, shall not exceed 9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Total Combined HAPs
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.99	24.99

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications on an as received wet basis:
 - a. less than 12 percent ash, by weight;
 - b. a sulfur content which is sufficient to comply with the allowable SO₂ emission limitation of 5.0 pounds sulfur dioxide/mmBtu actual heat input; and
 - c. greater than 11000 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the coal supplier for each shipment of coal.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for chlorine content.

[Authority for term: OAC rule 3745-77-07(A)(1)]

3. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for contents of metal hazardous air pollutants (HAPs).

[Authority for term: OAC rule 3745-77-07(A)(1)]

4. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, heat content, chlorine content, and for metal HAPs content.

[Authority for term: OAC rule 3745-77-07(A)(1)]

5. The permittee shall collect and record the following HAP information each month for all insignificant emissions unit listed in section A.2 of Part II of these terms and conditions and for emissions unit B001, K002, K003, K004 and P009, combined:

- a. for emissions unit B001 only, the chlorine emission rate as determined from section A.V.2 of these terms and conditions;

- b. for emissions unit B001 only, the emission rate for each individual metal HAP as determined from the permittee's or coal supplier's analysis, as specified in section A.III.3 and from section A.V.4 of these terms and conditions;

- c. for emissions unit B001 only, the total HAP emission rate for total combined HAPs (summation of sections A.III.5.a and A.III.5.b for all HAPs);

- d. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and total combined HAPs, in tons; and

- e. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and total combined HAPs, in tons.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall calculate and record the following information each month for this emissions unit:
- a. the total heat content as determined from section A.V.3 of these terms and conditions, in mmBtu;
 - b. the total monthly coal usage, in tons;
 - c. the annual, year-to-date, heat content as determined from the permittee's or coal analysis, as specified in section A.III.1 and from section A.V.3 of these terms and conditions, in mmBtu; and
 - d. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of the total heat content, in mmBtu.

[Authority for term: OAC rule 3745-77-07(A)(1)]

7. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(A)(1)]

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:
 - a. the total quantity of coal received in each shipment (tons);
 - b. the weighted* average ash content (percent) of the coal received during each calendar month;
 - c. the weighted* average sulfur content (percent) of the coal received during each calendar month;
 - d. the weighted* average heat content (Btu/pound) of the coal received during each calendar month; and
 - e. the weighted* average sulfur dioxide emissions rate (pounds of SO₂/mmBtu actual heat input) from the coal received each calendar month.

* in proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the chlorine content (ppm) and metal HAPs content of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:
 - a. the weighted* average chlorine content (ppm) of the coal received during each calendar month; and
 - b. the weighted* average metal HAPs content of the coal received during each calendar month.

* in proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that summarize the following:
 - a. the actual annual individual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined;
 - b. the actual annual total combined HAPs emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined; and
 - c. the actual annual coal heat content, in mmBtu, from this emissions unit.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month individual HAP and total combined HAPs emission limitations of 9.99 tons and 24.99 tons, respectively;
 - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and total combined HAPs emission limitations specified in section A.1.2.c;
 - c. all exceedances of the rolling, 12-month head content demand limitation of 300,000 tons; and
 - d. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coal heat content demand limitation specified in section A.1.2.b.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions not to exceed 35% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:

SO₂ emissions shall not exceed 5.0 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance may be determined by using the fuel analysis records required pursuant to section A.III.1 and the applicable equation in OAC rule 3745-18-04(F).

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and the procedures in OAC rule 3745-18-04(D).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

PE shall not exceed 0.28 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in section A.V.5 of these terms and conditions.

1.d Emission Limitation:

9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.5 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. Compliance with the maximum monthly chlorine emission rate shall be determined based on the following equation:

$$E = A*(B/1,000,000)*(C/D)$$

where:

E = chlorine emission rate, in tons per month;
A = tons of coal used per month;
B = chlorine content, in ppm;
C = HCL Molecular weight, 36.5 mol wt.; and
D = Cl Molecular Weight, 35.5 mol wt.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Compliance with the maximum monthly heat input demand limitation shall be determined based on the following equation:

$$E = A*B*(2000 \text{ lbs/ton})*(mmBtu/10^6 \text{ Btu})$$

where:

E = heat input demand, in mmBtu/month;
A = coal heat content analysis, as specified in A.III.1, in Btu/lb of coal; and
B = monthly coal usage, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

4. Compliance with the maximum monthly metal HAP limitation shall be determined based on the following equation:

$$E = \text{Summation of } (A*B)$$

where:

E = total monthly metal HAP emissions, in tons;

A = calculated monthly particulate emissions, in tons (based on section A.V.1.c of these terms and conditions); and

B = % by wt. of individual metal HAP content (based on coal analysis, as specified in section A.III.3 of these terms and conditions).

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. 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 6 months after the issuance of this permit and every 2.5 years thereafter.

b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate emission limitation of 0.28 lb/mmBtu of actual heat input and to determine lb/hr emission rates for particulate and HCL emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A and for HCL, Methods 1 through 4 and Method 26 or 26A of 40 CFR Part 60, Appendix A. 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 or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Green Tire Coating - Grader (K002)

Activity Description: Green Tire Coating Operation - Grader Tire Lube (Solvent-Based)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Green Tire Coating Operation Grader Tire Coating	OAC rule 3745-31-05(A)(3) (PTI 02-12388)	<p>Volatile organic compounds (VOC) emissions shall not exceed 740 pounds per day, based upon an average for each month.</p> <p>The total VOC emissions from this emissions unit shall not exceed 75.6 tons per year.</p>
	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour (based on Table I).
	OAC rule 3745-21-09(X)	See section A.1.2.a below.
	40 CFR Part 63, Subpart XXXX	See sections A.2 through A.7 in Part II and section A.1.2.b below.
	40 CFR Part 63, Subpart A	See Table 17 in 40 CFR Part 63, Subpart XXXX for the applicable sections of the general provisions.
		This emissions unit does not utilize a control device so the column for "not using a control device" applies.

2. Additional Terms and Conditions

- 2.a** In accordance with paragraph (2)(a) and (c) of OAC rule 3745-21-09(X), this emissions unit is exempt from the requirements of paragraph (1) of OAC rule 3745-21-09(X).
- 2.b** This emissions unit is subject to the applicable requirements of 40 CFR Part 63, Subpart XXXX.

2. Additional Terms and Conditions (continued)

2.c This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (Subpart DDDDD) regulations.

Annual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined, shall not exceed 9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for any combination of HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Total Combined HAPs
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.99	24.99

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-12388]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records which list the following information for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds of VOC per gallon of coating and cleanup material;
 - d. the water content, in percent by volume of each coating;
 - e. the solids content, in percent by volume of each coating;
 - f. the total number of days per month of operation of the emissions unit;
 - g. the pounds of VOC emitted per month;
 - h. the pounds of VOC emitted per day, calculated by dividing the monthly emission by the days of operation for the emissions unit, i.e., (g)/(f); and
 - i. documentation of the type, size (bead diameter and cross-sectional dimension), and quantity of tires produced in each production run and the duration (hours) of each production run.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following HAP information each month for emissions units K002, K003, K004 and P009, combined:
 - a. the permittee shall maintain records showing lists of each cement and solvent, as purchased, and the name of the supplier or manufacturer of each cement and solvent;
 - b. the permittee shall maintain records of test results indicating the mass percent of each HAP for each cement and solvent as purchased (The permittee shall use EPA Method 311 of 40 CFR Part 60, Appendix A, or an approved alternative method, for determining the HAP content of each cement and solvent.);
 - c. the emission rate for each individual HAP from each cement and solvent material employed, in lbs;
 - d. the total emission rate for each individual HAP from all cements and solvent materials employed (for each individual HAP, the summation of section A.III.3.c for all cements and solvent materials), in lbs;
 - e. the HAP emission rate for total combined HAPs from all cements and solvent materials employed (summation of section A.III.3.d for all HAPs for all cements and solvent materials), in lbs;
 - f. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and total combined HAPs, in tons; and
 - g. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and total combined HAPs, in tons.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily emission limitation for VOC. The report shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance is identified.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the event occurs.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit deviation (excursion) reports that identify all production runs not covered by the OAC rule 3745-21-09(X)(2)(a) and (X)(2)(c) exemptions. Each report shall be sent to the Ohio EPA Northeast District Office within 15 days after the production run occurred.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

5. In accordance with 63.6010(a) of 40 CFR, the permittee must submit compliance reports that contain the following requirements:

- a. a statement that there were no deviations from any emission limitations during the reporting period; and
- b. the information in section A.IV.7 of these terms and conditions if the permittee has a deviation from any emission limitations during the reporting period.

The permittee must submit the compliance reports semiannually according to the requirements in section A.IV.6 of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

6. In accordance with 63.6010(b) of 40 CFR, unless the Administrator of US EPA has approved a different schedule for submission of reports under 63.10(a) of 40 CFR, the permittee must submit each report by the date specified in section A.IV.5 of these terms and conditions and according to sections A.IV.6.a through A.IV.6.d of these terms and conditions:

- a. The first compliance report must cover the period beginning on the compliance date, which is upon start up of this emissions unit, and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
- b. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
- c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- d. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

7. In accordance with 63.6010(d) of 40 CFR, for each deviation from any emission limitations specified in section A.3 and A.4 of Part II of these terms and conditions that occurs, the compliance report must contain the information in sections A.IV.8 and A.IV.7 of these terms and conditions. This includes periods of startup, shutdown, and malfunction.

- a. the total operating time of each emissions unit during the reporting period; and
- b. information on the number, duration, and cause of deviations (including unknown causes, if applicable), and the corrective action taken.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

8. In accordance with 63.6010(c) of 40 CFR, the compliance report must contain the following information:

- a. company name and address;
- b. statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- c. date of the report and beginning and ending dates of the reporting period;
- d. if the permittee had a startup, shutdown or malfunction during the reporting period and the permittee took actions consistent with the permittee's startup, shutdown, and malfunction plan, the compliance report must include the information in 63.10(d)(5)(i) of 40 CFR;
- e. if there are no deviations from the requirements from any emission limitations of these terms and conditions, a statement that there were no deviations from the emission limitations during the reporting period.
- f. the emission limit option in 40 CFR 63.9584 and the compliance alternative in 40 CFR 63.5985 that the permittee has chosen to meet; and
- g. for each annual reporting period during which the permittee uses a cement and solvent that, as purchased, was not included in the list submitted with the Notification of Compliance Status in 63.6009(g) of 40 CFR, the permittee must submit an updated list of all cements and solvents, as purchased. The permittee must also include a statement certifying that each cement and solvent, as purchased, that was used at the facility during the reporting period met the HAP constituent limits specified in section A.3 and A.4 of Part II of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

9. In accordance with 63.6010(e) of 40 CFR, this facility, after obtaining a Title V operating permit pursuant to 40 CFR part 70 or 71, must report all deviations as defined in this permit in the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR. If the permittee submits a compliance report pursuant to section A.III.3 and 4 of these terms and conditions along with, or as part of, the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR which includes all required information concerning deviations from the emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permitting authority.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

10. Upon notification to the Administration of US EPA that the permittee has eliminated or reformulated cement and solvent, so that the permittee can demonstrate compliance using the purchase alternative in 63.5985(a) of 40 CFR, future compliance reports may be submitted annually.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

11. If acceptable to both the Administrator of US EPA and the permittee, reports and notifications may be submitted electronically.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

12. The permittee shall submit annual reports that summarize the following:

- a. the actual annual individual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined; and
- b. the actual annual combined HAPs emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

13. The permittee shall submit quarterly (excursion) reports that identify the following:

- a. all exceedances of the rolling, 12-month individual HAP and total combined HAPs emission limitations of 9.99 tons and 24.99 tons, respectively; and
- b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and total combined HAPs emission limitations specified in section A.I.2.c.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

VOC emissions shall not exceed 740 pounds per day, based upon an average for each month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. The VOC content of each coating and cleanup material employed shall be based upon formulation data or Method 24 of 40 CFR Part 60, Appendix A.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:

PE shall not exceed 0.551 pound per hour (based on Table I).

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the requirements specified in OAC rule 3745-17-03(B)(1).

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation:

The total VOC emissions from this emissions unit shall not exceed 75.6 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the record keeping requirements specified in section A.III.1.g for the calendar year.

[Authority for term: PTI 02-12388 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.e Emission Limitation:

2 lbs of individual HAP per ton of total cements and solvents (HAPs listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

1.f Emission Limitation:

20 lbs of individual HAP per ton of total cements and solvents (HAPs not listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

1.g Emission Limitations:

9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs for all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tire Bead Dipping (K003)
Activity Description: Tire Bead Dipping Operation - Bead Line (Solvent-Based)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Tire Bead Dip Tank	OAC rule 3745-21-09(X)	See section A.1.2.a below.
	40 CFR Part 63, Subpart XXXX	See sections A.2 through A.7 in Part II and section A.1.2.b below.
	40 CFR Part 63, Subpart A	See Table 17 in 40 CFR Part 63, Subpart XXXX for the applicable sections of the general provisions. This emissions unit does not utilize a control device so the column for "not using a control device" applies.

2. Additional Terms and Conditions

- 2.a In accordance with paragraph (2)(a) and (c) of OAC rule 3745-21-09(X), this emissions unit is exempt from the requirements of paragraph (1) of OAC rule 3745-21-09(X).
- 2.b This emissions unit is subject to the applicable requirements of 40 CFR Part 63, Subpart XXXX.

2. Additional Terms and Conditions (continued)

2.c This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (Subpart DDDDD) regulations.

Annual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined, shall not exceed 9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Total Combined HAPs
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.99	24.99

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the type, size (bead diameter and cross-sectional dimension), and quantity of tires produced in each production run and the duration (hours) of each production run on a monthly basis for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following HAP information each month for emissions units K002, K003, K004 and P009, combined:
 - a. the permittee shall maintain records showing lists of each cement and solvent, as purchased, and the name of the supplier or manufacturer of each cement and solvent;
 - b. the permittee shall maintain records of test results indicating the mass percent of each HAP for each cement and solvent as purchased (The permittee shall use EPA Method 311 of 40 CFR Part 60, Appendix A, or an approved alternative method, for determining the HAP content of each cement and solvent.);
 - c. the emission rate for each individual HAP from each cement and solvent material employed, in lbs;
 - d. the total emission rate for each individual HAP from all cements and solvent materials employed (for each individual HAP, the summation of section A.III.2.c for all cements and solvent materials), in lbs;
 - e. the HAP emission rate for total combined HAPs from all cements and solvent materials employed (summation of section A.III.2.d for all HAPs for all cements and solvent materials), in lbs;
 - f. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and total combined HAPs, in tons; and
 - g. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and total combined HAPs, in tons.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all production runs not covered by the OAC rule 3745-21-09(X)(2)(a) and (X)(2)(c) exemptions. Each report shall be sent to the Ohio EPA Northeast District Office within 15 days after the production run occurred.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. In accordance with 63.6010(a) of 40 CFR, the permittee must submit compliance reports that contain the following requirements:
 - a. a statement that there were no deviations from any emission limitations during the reporting period; and
 - b. the information in section A.IV.4 of these terms and conditions if the permittee has a deviation from any emission limitations during the reporting period.

The permittee must submit the compliance reports semiannually according to the requirements in section A.IV.3 of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. In accordance with 63.6010(b) of 40 CFR, unless the Administrator of US EPA has approved a different schedule for submission of reports under 63.10(a) of 40 CFR, the permittee must submit each report by the date specified in section A.IV.2 of these terms and conditions and according to sections A.IV.3.a through A.IV.3.d of these terms and conditions:
- a. The first compliance report must cover the period beginning on the compliance date, which is upon start up of this emissions unit, and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
 - b. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
 - c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - d. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

4. In accordance with 63.6010(d) of 40 CFR, for each deviation from any emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions that occurs, the compliance report must contain the information in sections A.IV.5 and A.IV.4 of these terms and conditions. This includes periods of startup, shutdown, and malfunction.
- a. the total operating time of each emissions unit during the reporting period; and
 - b. information on the number, duration, and cause of deviations (including unknown causes, if applicable), and the corrective action taken.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

5. In accordance with 63.6010(c) of 40 CFR, the compliance report must contain the following information:
- a. company name and address;
 - b. statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - c. date of the report and beginning and ending dates of the reporting period;
 - d. if the permittee had a startup, shutdown or malfunction during the reporting period and the permittee took actions consistent with the permittee's startup, shutdown, and malfunction plan, the compliance report must include the information in 63.10(d)(5)(i) of 40 CFR;
 - e. if there are no deviations from the requirements from any emission limitations of these terms and conditions, a statement that there were no deviations from the emission limitations during the reporting period.
 - f. the emission limit option in 40 CFR 63.9584 and the compliance alternative in 40 CFR 63.5985 that the permittee has chosen to meet; and
 - g. for each annual reporting period during which the permittee uses a cement and solvent that, as purchased, was not included in the list submitted with the Notification of Compliance Status in 63.6009(g) of 40 CFR, the permittee must submit an updated list of all cements and solvents, as purchased. The permittee must also include a statement certifying that each cement and solvent, as purchased, that was used at the facility during the reporting period met the HAP constituent limits specified in section A.3 and A.4 of Part II of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

6. In accordance with 63.6010(e) of 40 CFR, this facility, after obtaining a Title V operating permit pursuant to 40 CFR part 70 or 71, must report all deviations as defined in this permit in the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR. If the permittee submits a compliance report pursuant to section A.III.3 and 4 of these terms and conditions along with, or as part of, the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR which includes all required information concerning deviations from the emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permitting authority.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

7. Upon notification to the Administration of US EPA that the permittee has eliminated or reformulated cement and solvent, so that the permittee can demonstrate compliance using the purchase alternative in 40 CFR 63.5985(a), future compliance reports may be submitted annually.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

8. If acceptable to both the Administrator of US EPA and the permittee, reports and notifications may be submitted electronically.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

9. The permittee shall submit annual reports that summarize the following:
- a. the actual annual individual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined; and
 - b. the actual annual combined HAPs emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

10. The permittee shall submit quarterly (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month individual HAP and total combined HAPs emission limitations of 9.99 tons and 24.99 tons, respectively; and
 - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and total combined HAPs emission limitations specified in section A.1.2.c.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

2 lbs of individual HAP per ton of total cements and solvents (HAPs listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

20 lbs of individual HAP per ton of total cements and solvents (HAPs not listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2. Emission Limitation:

9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs for all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.2 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Undertread Cementing (K004)
Activity Description: Undertread Cementing Operation - Tread Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Undertread Cementing Operation Tread Line(K004)	OAC rule 3745-31-05(A)(3) (PTI No. 02-11041)	<p>Volatile organic compounds (VOC) emissions shall not exceed 450 pounds per day, based upon an average for each month.</p> <p>The total VOC emissions from this emissions unit shall not exceed 81.9 tons per year.</p>
	OAC rule 3745-21-09(X)	See section A.1.2.a below.
	40 CFR Part 63, Subpart XXXX	See sections A.2 through A.7 in Part II and section A.1.2.b below.
	40 CFR Part 63, Subpart A	<p>See Table 17 in 40 CFR Part 63, Subpart XXXX for the applicable sections of the general provisions.</p> <p>This emissions unit does not utilize a control device so the column for "not using a control device" applies.</p>

2. Additional Terms and Conditions

- 2.a** In accordance with paragraph (2)(a) and (c) of OAC rule 3745-21-09(X), this emissions unit is exempt from the requirements of paragraph (1) of OAC rule 3745-21-09(X).
- 2.b** This emissions unit is subject to the applicable requirements of 40 CFR Part 63, Subpart XXXX.

2. Additional Terms and Conditions (continued)

2.c This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (Subpart DDDDD) regulations.

Annual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined, shall not exceed 9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Total Combined HAPs
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.99	24.99

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records which list at a minimum the following information for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup materials employed, in pounds of VOC per gallon of coating and cleanup material;
 - d. the water content, in percent by volume of each coating;
 - e. the solids content, in percent by volume of each coating;
 - f. the total number of days per month of operation of the emissions unit;
 - g. the pounds of VOC emitted per month;
 - h. the pounds of VOC emitted per day, calculated by dividing the monthly emission by the days of operation for each emissions unit; and
 - i. documentation of the type, size (bead diameter and cross-sectional dimension), and quantity of tires produced in each production run and the duration (hours) of each production run.

[Authority for term: PTI 02-11041 and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record the following HAP information each month for emissions units K002, K003, K004 and P009, combined:
 - a. the permittee shall maintain records showing lists of each cement and solvent, as purchased, and the name of the supplier or manufacturer of each cement and solvent;
 - b. the permittee shall maintain records of test results indicating the mass percent of each HAP for each cement and solvent as purchased (The permittee shall use EPA Method 311 of 40 CFR Part 60, Appendix A, or an approved alternative method, for determining the HAP content of each cement and solvent.);
 - c. the emission rate for each individual HAP from each cement and solvent material employed, in lbs;
 - d. the total emission rate for each individual HAP from all cements and solvent materials employed (for each individual HAP, the summation of section A.III.2.c for all cements and solvent materials), in lbs;
 - e. the HAP emission rate for total combined HAPs from all cements and solvent materials employed (summation of section A.III.2.d for all HAPs for all cements and solvent materials), in lbs;
 - f. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and total combined HAPs, in tons; and
 - g. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and total combined HAPs, in tons.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily emission limitation for VOC. Each report shall be sent to the appropriate Ohio EPA Northeast District Office within 30 days after the exceedance is identified.

[Authority for term: PTI 02-11041 and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify all production runs not covered by the OAC rule 3745-21-09(X)(2)(a) and (X)(2)(c) exemptions. Each report shall be sent to the Ohio EPA Northeast District Office within 15 days after the production run occurred.

[Authority for term: PTI 02-11041 and OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: PTI 02-11041 and OAC rule 3745-77-07(C)(1)]

4. In accordance with 63.6010(a) of 40 CFR, the permittee must submit compliance reports that contain the following requirements:

- a. a statement that there were no deviations from any emission limitations during the reporting period; and
- b. the information in section A.IV.6 of these terms and conditions if the permittee has a deviation from any emission limitations during the reporting period.

The permittee must submit the compliance reports semiannually according to the requirements in section A.IV.5 of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

5. In accordance with 63.6010(b) of 40 CFR, unless the Administrator of US EPA has approved a different schedule for submission of reports under 63.10(a) of 40 CFR, the permittee must submit each report by the date specified in section A.IV.4 of these terms and conditions and according to sections A.IV.5.a through A.IV.5.d of these terms and conditions:

- a. The first compliance report must cover the period beginning on the compliance date, which is upon start up of this emissions unit, and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
- b. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
- c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- d. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

6. In accordance with 63.6010(d) of 40 CFR, for each deviation from any emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions that occurs, the compliance report must contain the information in sections A.IV.7 and A.IV.6 of these terms and conditions. This includes periods of startup, shutdown, and malfunction.

- a. the total operating time of each emissions unit during the reporting period; and
- b. information on the number, duration, and cause of deviations (including unknown causes, if applicable), and the corrective action taken.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

7. In accordance with 63.6010(c) of 40 CFR, the compliance report must contain the following information:
- company name and address;
 - statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - date of the report and beginning and ending dates of the reporting period;
 - if the permittee had a startup, shutdown or malfunction during the reporting period and the permittee took actions consistent with the permittee's startup, shutdown, and malfunction plan, the compliance report must include the information in 63.10(d)(5)(i) of 40 CFR;
 - if there are no deviations from the requirements from any emission limitations of these terms and conditions, a statement that there were no deviations from the emission limitations during the reporting period.
 - the emission limit option in 40 CFR 63.9584 and the compliance alternative in 40 CFR 63.5985 that the permittee has chosen to meet; and
 - for each annual reporting period during which the permittee uses a cement and solvent that, as purchased, was not included in the list submitted with the Notification of Compliance Status in 63.6009(g) of 40 CFR, the permittee must submit an updated list of all cements and solvents, as purchased. The permittee must also include a statement certifying that each cement and solvent, as purchased, that was used at the facility during the reporting period met the HAP constituent limits specified in section A.3 and A.4 of Part II of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

8. In accordance with 63.6010(e) of 40 CFR, this facility, after obtaining a Title V operating permit pursuant to 40 CFR part 70 or 71, must report all deviations as defined in this permit in the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR. If the permittee submits a compliance report pursuant to section A.III.3 and 4 of these terms and conditions along with, or as part of, the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR which includes all required information concerning deviations from the emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permitting authority.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

9. Upon notification to the Administration of US EPA that the permittee has eliminated or reformulated cement and solvent, so that the permittee can demonstrate compliance using the purchase alternative in 40 CFR 63.5985(a), future compliance reports may be submitted annually.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

10. If acceptable to both the Administrator of US EPA and the permittee, reports and notifications may be submitted electronically.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

- 11.** The permittee shall submit annual reports that summarize the following:
- a. the actual annual individual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined; and
 - b. the actual annual combined HAPs emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- 12.** The permittee shall submit quarterly (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month individual HAP and total combined HAPs emission limitations of 9.99 tons and 24.99 tons, respectively; and
 - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and total combined HAPs emission limitations specified in section A.I.2.c.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

- 1.** Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

VOC emissions shall not exceed 450 pounds per day, based upon an average for each month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. The VOC content of each coating and cleanup material employed shall be based upon formulation data or 40 CFR Part 60, Appendix A, Method 24.

[Authority for term: PTI 02-11041 and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

The total VOC emissions from this emissions unit shall not exceed 81.9 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.g for the calendar year.

[Authority for term: PTI 02-11041 and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

2 lbs of individual HAP per ton of total cements and solvents (HAPs listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation:

20 lbs of individual HAP per ton of total cements and solvents (HAPs not listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

1.e Emission Limitation:

9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs for all insignificant emissions unit listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.2 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #9 Banbury Mixer (P002)
Activity Description: #9 Banbury and Associated Equipment

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
#9 Banbury Mixer and Associated Equipment with Baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 4.30 pounds per hour (based on Figure II).
	OAC rule 3745-17-07(B)(1)	See section A.1.2.a below.
	OAC rule 3745-17-08(B)	See section A.1.2.b below.

2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions of fugitive dust shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows and roof monitors.
- 2.b The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fan, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust to the baghouse; and
 - ii. a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall perform weekly checks for any visible fugitive particulate emissions, when the weather conditions allow, from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building housing this emissions unit. This weekly check shall be performed at a time that is representative of the typical activity of the several operations housed within this building (regardless of whether this specific unit is in operation). The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

PE shall not exceed 4.30 pounds per hour (based on Figure II).

Applicable Compliance Method:

To determine the hourly particulate emissions rate for this emissions unit, the following equation may be used:

$$E = A \cdot (1 - 99\%)$$

where:

E = particulate emissions (lb/hr);

A = 22.37 lbs/hr, maximum uncontrolled rate of emission (based on Rubber Manufacturing Association emission factors, supplied by facility); and

99% = fabric filter baghouse control efficiency (manufacturer's specification, supplied by facility).

If required, compliance with the particulate emission rate shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the requirements specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the requirements specified in OAC rule 3745-17-03(B)(3)(a) and (B)(3)(b).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 3 Blast Booths (P007)
Activity Description: Three (3) Glass Shot Blasters

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Three (3) enclosed blast booths for cleaning tire molds. Equipped with common cyclone control.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 3.83 pounds per hour (based on Table I).

2. Additional Terms and Conditions

- 2.a No fugitive emissions are being generated during operation of this emissions unit. All PE generated from this emissions unit are vented to a cyclone and multi-clone.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving these emissions units and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the requirements specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:

PE shall not exceed 3.83 pounds per hour (based on Table I).

Applicable Compliance Method:

To determine the hourly particulate emissions rate for this emissions unit, the following equation may be used:

$$E = A*(1 - 99\%)$$

where:

E = particulate emissions (lb/hr);

A = 32.19 lbs/hr, maximum uncontrolled rate of emission (based on Rubber Manufacturing Association emission factors, supplied by facility); and

99% = fabric filter baghouse control efficiency (manufacturer's specification, supplied by facility).

If required, compliance with the particulate emission rate shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #11 Banbury Mixer (P008)
Activity Description: #2-11 Banbury and Associated Equipment

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
#11 Banbury Mixer and Associated Equipment with Baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 5.44 pounds per hour (based on Figure II).
	OAC rule 3745-17-07(B)(1)	See section A.I.2.a below.
	OAC rule 3745-17-08(B)	See section A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions of fugitive dust shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fan, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust to the baghouse; and
 - ii. a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall perform weekly checks for any visible fugitive particulate emissions, when the weather conditions allow, from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building housing this emissions unit. This weekly check shall be performed at a time that is representative of the typical activity of the several operations housed within this building (regardless of whether this specific unit is in operation). The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the requirements specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:

PE shall not exceed 5.44 pounds per hour (based on Figure II).

Applicable Compliance Method:

To determine the hourly particulate emissions rate for this emissions unit, the following equation may be used:

$$E = A*(1 - 99\%)$$

where:

E = particulate emissions (lb/hr);

A = 32.19 lbs/hr, maximum uncontrolled rate of emission (based on Rubber Manufacturing Association emission factors, supplied by facility); and

99% = fabric filter baghouse control efficiency (manufacturer's specification, supplied by facility).

If required, compliance with the particulate emission rate shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the requirements specified in OAC rule 3745-17-03(B)(3)(a) and (B)(3)(b).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Tire Tackifier (P009)

Activity Description: Manual Application of Tire Tackifier Solvent - Tire Room Tackifier

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Manual Application of Tire Tackifier Solvent	OAC rule 3745-21-07(G)(2)	exempt See section A.I.2.a below.
	40 CFR Part 63, Subpart XXXX	See sections A.2 through A.7 in Part II and section A.I.2.b below.
	40 CFR Part 63, Subpart A	See Table 17 in 40 CFR Part 63, Subpart XXXX for the applicable sections of the general provisions. This emissions unit does not utilize a control device so the column for "not using a control device" applies.

2. Additional Terms and Conditions

- 2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 2.b This emissions unit is subject to the applicable requirements of 40 CFR Part 63, Subpart XXXX.

2. Additional Terms and Conditions (continued)

2.c This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (Subpart DDDDD) regulations.

Annual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined, shall not exceed 9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs.

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

Maximum Allowable Cumulative HAP Emission Rates (tons):

Month(s)	Individual HAP	Total Combined HAPs
1 - 1	0.83	2.08
1 - 2	1.66	4.16
1 - 3	2.49	6.24
1 - 4	3.32	8.32
1 - 5	4.15	10.40
1 - 6	4.98	12.48
1 - 7	5.81	14.56
1 - 8	6.64	16.64
1 - 9	7.47	18.72
1 - 10	8.30	20.80
1 - 11	9.13	22.88
1 - 12	9.99	24.99

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each liquid organic material employed:
 - a. the company identification for each such material; and
 - b. documentation as to whether or not each such material is a photochemically reactive material.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following HAP information each month for emissions units K002, K003, K004 and P009, combined:
 - a. the permittee shall maintain records showing lists of each cement and solvent, as purchased, and the name of the supplier or manufacturer of each cement and solvent;
 - b. the permittee shall maintain records of test results indicating the mass percent of each HAP for each cement and solvent as purchased (The permittee shall use EPA Method 311 of 40 CFR Part 60, Appendix A, or an approved alternative method, for determining the HAP content of each cement and solvent.);
 - c. the emission rate for each individual HAP from each cement and solvent material employed, in lbs;
 - d. the total emission rate for each individual HAP from all cements and solvent materials employed (for each individual HAP, the summation of section A.III.2.c for all cements and solvent materials), in lbs;
 - e. the HAP emission rate for total combined HAPs from all cements and solvent materials employed (summation of section A.III.2.d for all HAPs for all cements and solvent materials), in lbs;
 - f. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and total combined HAPs, in tons; and
 - g. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and total combined HAPs, in tons.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the identification of any photochemically reactive liquid organic material employed, the day(s) such materials were employed, the amount of any such materials employed, and the total pounds of organic compounds emitted. The reports shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. In accordance with 63.6010(a) of 40 CFR, the permittee must submit compliance reports that contain the following requirements:
 - a. a statement that there were no deviations from any emission limitations during the reporting period; and
 - b. the information in section A.IV.4 of these terms and conditions if the permittee has a deviation from any emission limitations during the reporting period.

The permittee must submit the compliance reports semiannually according to the requirements in section A.IV.3 of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. In accordance with 63.6010(b) of 40 CFR, unless the Administrator of US EPA has approved a different schedule for submission of reports under 63.10(a) of 40 CFR, the permittee must submit each report by the date specified in section A.IV.2 of these terms and conditions and according to sections A.IV.3.a through A.IV.3.d of these terms and conditions:
- a. The first compliance report must cover the period beginning on the compliance date, which is upon start up of this emissions unit, and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
 - b. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date, which is upon start up of this emissions unit.
 - c. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - d. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

4. In accordance with 63.6010(d) of 40 CFR, for each deviation from any emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions that occurs, the compliance report must contain the information in sections A.IV.5 and A.IV.4 of these terms and conditions. This includes periods of startup, shutdown, and malfunction.
- a. the total operating time of each emissions unit during the reporting period; and
 - b. information on the number, duration, and cause of deviations (including unknown causes, if applicable), and the corrective action taken.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

5. In accordance with 63.6010(c) of 40 CFR, the compliance report must contain the following information:
- a. company name and address;
 - b. statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - c. date of the report and beginning and ending dates of the reporting period;
 - d. if the permittee had a startup, shutdown or malfunction during the reporting period and the permittee took actions consistent with the permittee's startup, shutdown, and malfunction plan, the compliance report must include the information in 63.10(d)(5)(i) of 40 CFR;
 - e. if there are no deviations from the requirements from any emission limitations of these terms and conditions, a statement that there were no deviations from the emission limitations during the reporting period.
 - f. the emission limit option in 40 CFR 63.9584 and the compliance alternative in 40 CFR 63.5985 that the permittee has chosen to meet; and
 - g. for each annual reporting period during which the permittee uses a cement and solvent that, as purchased, was not included in the list submitted with the Notification of Compliance Status in 63.6009(g) of 40 CFR, the permittee must submit an updated list of all cements and solvents, as purchased. The permittee must also include a statement certifying that each cement and solvent, as purchased, that was used at the facility during the reporting period met the HAP constituent limits specified in section A.3 and A.4 of Part II of these terms and conditions.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

6. In accordance with 63.6010(e) of 40 CFR, this facility, after obtaining a Title V operating permit pursuant to 40 CFR part 70 or 71, must report all deviations as defined in this permit in the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR. If the permittee submits a compliance report pursuant to section A.III.3 and 4 of these terms and conditions along with, or as part of, the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A) of 40 CFR which includes all required information concerning deviations from the emission limitations specified in sections A.3 and A.4 of Part II of these terms and conditions, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permitting authority.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

7. Upon notification to the Administration of US EPA that the permittee has eliminated or reformulated cement and solvent, so that the permittee can demonstrate compliance using the purchase alternative in 40 CFR 63.5985(a), future compliance reports may be submitted annually.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

8. If acceptable to both the Administrator of US EPA and the permittee, reports and notifications may be submitted electronically.

[Authority for the term: 40 CFR Part 63, Subpart XXXX, and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

9. The permittee shall submit annual reports that summarize the following:
- a. the actual annual individual HAP emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined; and
 - b. the actual annual combined HAPs emissions from all insignificant emissions units listed in section A.2 of Part II of these terms and conditions and from emissions units B001, K002, K003, K004 and P009, combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

10. The permittee shall submit quarterly (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month individual HAP and total combined HAPs emission limitations of 9.99 tons and 24.99 tons, respectively; and
 - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and total combined HAPs emission limitations specified in section A.I.2.c.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

2 lbs of individual HAP per ton of total cements and solvents (HAPs listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

20 lbs of individual HAP per ton of total cements and solvents (HAPs not listed in Table 16 of 40 CFR Part 63, Subpart XXXX)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.5 of Part II of these terms and conditions.

[Authority for term: 40 CFR Part 63, Subpart XXXX and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitations:

9.99 tons per rolling, 12-month period for any individual HAP and 24.99 tons per rolling, 12-month period for total combined HAPs for all insignificant emissions unit listed in section A.2 of Part II of this permit and from emissions units B001, K002, K003, K004 and P009, combined

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section A.III.2 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Denman Tire Corporation
Premise Number	0278000013
What makes this facility a Title V facility?	SO ₂ ,VOC,PM
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A

<p>Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)</p>	<ol style="list-style-type: none">(1) Moved all insignificant units to the State-Federal enforceable section of the permit Part II.A.(2) Added monitoring and recordkeeping requirements in permit Part II. A. of the State-Federal enforceable section due to this facility being subject to 40 CFR Part 63 (Subpart XXXX).(3) Added additional insignificant emissions unit in permit Part II.A. of the State-Federal enforceable section.(4) Sited authority for all terms in the entire permit.(5) Deleted emissions units B003 and B004 (shudown units)(6) Added emissions units P002 and P007 in Part III.
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Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	77-07(A)(13)		identification of IEU with applicable requirements
A.2		40 CFR 63	MACT Subpart XXXX

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001	35% opacity	17-07(C)	40 CFR 52.1870(c)(65)	N	N	Y	N	N	Y	N	Y	N	Y	N	
B001	0.28 lbs of PE/MM Btu	17-10	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: restriction on ash content in coal
B001	5.0 lbs SO2/MM Btu	18-84(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: restriction on sulfur content in coal
B001	9.99 HAP, 24.99 HAPs	35-07(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
B001	300,000 MMBtu/yr	35-07(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

K002, K003, K004	none	21-09(X)	N	N	N	Y	N	N	Y	N	Y	N	N	N	This facility is exempt rom 21-09 due to type of tire produced
K002	0.551 lb of PE/hr	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: particulate filter required
K002, P002, P007, P008	20% opacity as a 6 min average	17-07	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: particulate filter required
K002	740 lbs of VOC/day, 75.6 tpy	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
K002, K003, K004, P009	2 lbs of total cements and solvents for each HAP (listed HAP in Table 16 of 40 CFR Part 63, Subpart XXXX	N	40 CFR Part 63, Subpart XXXX	N	N	Y	N	N	Y	N	Y	N	Y	N	
K002, K003, K004, P009	20 lbs of total cements and solvents for each HAP (not listed HAP in Table 16 of 40 CFR Part 63, Subpart XXXX	N	40 CFR Part 63, Subpart XXXX	N	N	Y	N	N	Y	N	Y	N	Y	N	
K004	450 lbs of VOC/day, 81.9 tpy	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P002	4.30lbs/hr	17-11 (based on Fig. II limit)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	

P002, P008	20% opacity as a 3-minute average	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P007	3.83 lbs/hr	17-11 (based on Table I)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P008	5.44 lbs/hr	17-11 (based on Table I)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control

equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.