



State of Ohio Environmental Protection Agency

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9/22/2008

Ron Seibert
Veyance Technologies, Inc.
1115 South Wayne Street
St. Marys, OH 45885-0999

Certified Mail

Facility ID: 0306010138
Permit Number: P0086804
County: Auglaize

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Wapakoneta Daily News. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Indiana

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit
Veyance Technologies, Inc.

Issue Date: 9/22/2008
Permit Number: P0086804
Permit Type: Renewal
Permit Description: Renewal Title V Application
Facility ID: 0306010138
Facility Location: Veyance Technologies, Inc.
1115 South Wayne Street,
St. Marys, OH 45885-0999
Facility Description: All Other Rubber Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control Title V operating permit for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.state.oh.us/dapc

Statement of Basis For Title V Permit

Part I - General

Company Name	Veyance Technologies	
Premise Number	03 06 01 0138	
What makes this facility a Title V facility?	VOC, HAP	
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	
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)	N/A	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

X 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 AN in the column under ASIP. If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a AY should be noted in the AOther column, and if not, an AN should be noted. Whether the basis for the term and condition is the ASIP or AOther, an explanation of each term and condition in Part II must be provided in the AComments 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												
B003 B007	4.2 lb SO2 /mmBtu	18-12 (C)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must use fuel with compliant sulfur content. M - Fuel sulfur sampling and analysis from supplier. ET - None - Mass balance calculations determine compliance.
B003 B007	0.24 lb PE /mmBtu *	17-10 (C)(2)		N	Y	Y	N	N	Y	N	Y	N	Y	N	* when firing No. 6 oil and No. 2 oil OR - Must use only No. 6 oil and/or No. 2 oil. M - Requirement to track the type of fuel used
B001 B002	0.020 lb PE mBtu *	17-10 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	* when firing No. 2 oil M - Requirement to track the type of fuel used ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.

B001 B002	20 opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks. ET - None normally required for opacity alone.
K020	202 lb VOC day, 30.9 ton VOC /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	OR - 416 gal/yr primer, 520 gal/yr topcoat usage M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination.
K030	less than 10 gallons coating usage per day	21-09 (U)(2)(e) (iii)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - less than 10 gallons coating usage per day * M - Tracking of coating usage.
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K031	81.6 lb VOC day, 5.21 ton VOC /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination. * daily limit is coatings only, not clean-up
K031	3.5 lb VOC /gal	21-09 (U)(1)(c)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Direct tracking of coating VOC content. ET - From formulation data or Method 24
K033	61.8 lb VOC day, 11.3 ton VOC /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination. * for primer coating
K033	64.0 lb VOC day, 11.7 ton	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as

	VOC /yr *															compliance determination. * for adhesive coating
K033	6.76 lb VOC month, 0.04 ton VOC /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N		M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination. * for clean-up operations
K033	less than 10 gallons coating usage per day *	21-09 (U)(2)(e) (iii)		N	Y	Y	N	N	Y	N	Y	N	N	N		OR - less than 10 gallons coating usage per day * M - Tracking of coating usage. * for primer and adhesive each - each is a separate line
P001	3.5 lb VOC /gal	21-09 (U)(1)(c)		N	N	Y	N	N	Y	N	Y	N	N	N		M - Direct tracking of coating VOC content. ET - From formulation data or Method 24 – special procedures for dip tank
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc		<u>Comments</u>
		SIP (3745-)	Other													
K003 K004 K005 K006 K007 K008 K011 K012 K013 K014 K015 K019 K020 K031 K031 K033	overspray - work practice standards	17-11 (C)		N	N	Y	N	N	Y	N	Y	N	N	N		M – Inspection and maintenance program. ET – None.
P005	28.4 lb PE	17-11		N	N	Y	N	N	Y	N	Y	N	N	N		M - Baghouse pressure drop monitoring.

P 01 7 P 08 3	/hr *	(B)(2)													ET - None - per Ohio EPA Engineering Guide 16 * for all emissions units combined
P017	0.07 lb PE /hr; 0.32 ton PE /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
P017	1.78 lb VOC /hr, 7.82 ton VOC /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity* determines compliance.
P021	16.7 lb PE /hr	17-11 (B)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
P022 P023 P025 P026 P028	67.9 lb PE /hr *	17-11 (B)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16 * for all emissions units combined
P034	4.36 lb PE /hr	17-11 (B)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Weekly visible emissions checks. ET - None - per Ohio EPA Engineering Guide 16
P066	0.48 lb PE /hr; 2.10 ton PE /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
P080	0.24 lb PE /hr; 1.05 ton PE /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
P005 P017 P021 P022 P023 P025	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring for PE also serves as monitoring for opacity. ET - None normally required for opacity alone.

P026 P028 P080 P083															
K003 K004 K005 K006 K007 K008 K011 K012 K013 K014 K015 K019	255 tons VOC/year	SIP variance	40 CFR 52.18 70(c) (84)	N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination.
K003 K004 K005 K012 K013 K015 K019 K033	37.7 lb HAP /gal solids *		40 CFR 63. 3890 (b)(4)	N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination. * rolling 12-month average - all emissions units combined
K006 K007 K008 K011 K014 K020	37.7 lb HAP /gal solids *		40 CFR 63. 3890 (b)(4)	N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination. * rolling 12-month average, including add-on control option, all or in part - all emissions units combined
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
P034	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Weekly visible emissions checks. ET - None normally required for opacity alone.
K030 K031	2.6 lb HAP /gal solids *		40 CFR 63. 3890	N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as

			(b)(1)													
																<p>compliance determination.</p> <p>* rolling 12-month average - both emissions units combined</p>
P005 P017 P021 P022 P023 P025 P026 P028 P034 P066 P080 P083	N/A	17-11 (B)(2)		Y	N	N	N	N	N	N	N	N	N	N	N	<p>ND - The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Crawford County, which is identified as a P-2 county.</p>
P005 P017 P021 P022 P023 P025 P026 P028 P034 P066 P080 P083	N/A	17-07 (A)(1)		Y	N	N	N	N	N	N	N	N	N	N	N	<p>This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.</p>
P005 P017 P083	N/A	21-07 (G)		Y	N	N	N	N	N	N	N	N	N	N	N	<p>ND - This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234</p>

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

X **Instructions for Part III:**

- X 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.
- X 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 AN@ in the column under ASIP.@ If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a AY@ should be noted in the AOther@ column, and if not, an AN@ should be noted. If the basis for the term and condition is AOther,@ an explanation of the basis must be provided in the AComments@ section. If OAC rule 3745-31-05 is cited in the AOther@ column, please indicate in the AComments@ section whether or not all of the requirements have been transferred from the permit to install.
- § To complete the remainder of the table after ABasis,@ except for the AComments@ section, simply specify a AY@ for yes or an AN@ for no. For the AM,@ AR,@ ARp,@ and AET@ columns, if AN@ is specified, there should be a brief explanation in the AComments@ section as to why there are no requirements. If a brief explanation is provided in the AComments@ 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 AComments@ 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 AMonitoring,@ ARecord Keeping,@ or AReporting@ 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 AMonitoring,@ ARecord Keeping,@ or AReporting@ 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 AComments@ section would be sufficient.

Also, if a AY@ is noted under AOR,@ AMisc,@ ASt,@ AND,@ or AENF@ an explanation of the requirements must be provided in the AComments@ section. In addition to a general explanation of the AOR,@ AMisc,@ ASt,@ AND,@ and/or AENF@ 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 AMiscellaneous Requirements@ section of the permit, provide an explanation in the AComments@ section of the violation, basis for the violation, and the company=s proposed control plan and schedule.
 3. If the AND@ column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
- A. If the AENF@ 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 AN@ is noted in the AOR,@ AMisc,@ ASt,@ AND,@ or AENF@ columns.

- X **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 AN/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 AComments@ 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 AN/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.



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Title V Permit
for
Veyance Technologies, Inc.**

Facility ID: 0306010138

Permit Number: P0086804

Permit Type: Renewal

Issued: 9/22/2008

Effective: To be entered upon final issuance

Expiration: To be entered upon final issuance

Air Pollution Title V Permit
for
Veyance Technologies, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0306010138

Facility Description: To be determined by county engineer.

Application Number(s): A0017652

Permit Number: P0086804

Permit Description: Renewal Title V Application

Permit Type: Renewal

Issue Date: 9/22/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Veyance Technologies, Inc.
1115 South Wayne Street
St. Marys, OH 45885-0999

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) 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 Standard Term and Condition A.2.c)(2) 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))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions 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 Standard 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 Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) 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 Standard Term and Condition A.2)c)(2) 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; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) 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 section B. Facility-Wide Terms and Conditions 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 Standard Term and Condition A.2.c)(2) 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))

- (4) 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))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

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

3. 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 Standard Term and Condition A.2.c)(1) above.

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

4. 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))

5. 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))



6. 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))

7. 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 Standard Term and Condition A.11 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 when:
 - (1) 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
 - (2) 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



(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. 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))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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))

12. 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))

13. 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:
 - (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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:
- (1) 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.
 - (2) 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.
 - (3) 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))

14. 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))

15. 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))

16. 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))

17. 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))

18. 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.)

19. 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))

20. 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))

21. 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))

22. 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)

23. 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))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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.)

25. Records Retention Requirements Under State Law Only

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.

26. 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.

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

27. 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).

28. 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.

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

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 Standard Term and Condition A.2.c)(2); 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) B. 4.

2. The following insignificant emissions units are located at this facility:
 - a) K024 - Maintenance Paint Spray Booth (PTI 03-7960)
 - b) K025 - Hay Roll Washer/Dryer (PTI 03-7960)
 - c) K032 - S5S Paint Spray Booth (PTI 03-10375)
 - d) P051 - Pyrolysis Oven (PTI 03-3183)
 - e) P053 - R7-Injection Press (PTI 03-4028)
 - f) P057 - Metal Cleaning Shot Blaster #9 (PTI 03-4207)
 - g) P058 - Carbon Black Handling System (PTI 03-4206)
 - h) P061 - Cement House Mixer
 - i) P062 - R32-Injection Press (PTI 03-6728)
 - j) P063 - R33-Injection Press (PTI 03-6728)
 - k) P064 - R34-Injection Press (PTI 03-6728)
 - l) P067 - R10-Injection Press (PTI 03-6964)
 - m) P069 - R12-Injection Press (PTI 03-6964)
 - n) P070 - D54-Injection Press (PTI 03-6964)
 - o) P071 - Hay Roll Blaster (PTI 03-7960)
 - p) T005 - Waste Oil Tank (PTI 03-6964)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and 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 of the applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

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

3. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart M: K003, K004, K005, K006, K007, K008, K011, K012, K013, K014, K015, K019, K020, K030, K031, and K033. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
 - a) P002 - Buffer Rubber/Steel Parts #1
 - b) P003 - Buffer Rubber/Steel Parts #2
 - c) P041 - Scale Removal Sand Blaster
 - d) P043 - D60-Injection Press
 - e) P065 - D64-Injection Press
 - f) P084 - Complete Cure Track Press
 - g) P086 - Flat Cure Track Press



- h) R039 - Injection Press
- i) R040 - Injection Press
- j) T001 - #6 Fuel Tank
- k) T002 - Propane Tank
- l) T003 - #2 Fuel Tank
- m) T004 - Ethylene Glycol Tank
- n) T006 - Flamite Tank
- o) T010 - Urbonin Tank
- p) T017 - Naphthine Tank
- q) T018 - Drakine Tank
- r) T019 - Neutrine Tank
- s) T020 - Nitrogen Tank
- t) Z001 - Waste Water Clarifier
- u) Z009 - Cistern WWT North
- v) Z010 - Cistern WWT
- w) Z016 - D56-Injection Press
- x) Z018 - D51-Injection Press
- y) Z021 - Mold Shot Blaster
- z) Z022 - Mold Shot Blaster Injection
- aa) Z023 - D59-Injection Press
- bb) Z025 - Injection Press Cyclone 1 R&D
- cc) Z026 - Injection Press Cyclone 2 R&D
- dd) Z027 - Injection Press Cyclone 3 R&D
- ee) Z028 - Injection Press Rutil L1 R&D
- ff) Z033 - D62-Injection Press
- gg) Z034 - D61-Injection Press
- hh) Z037 - R1-Injection Press
- ii) Z044 - R5-Injection Press
- jj) Z046 - Compression Press 1
- kk) Z047 - Compression Press 2
- ll) Z048 - Compression Press 3
- mm) Z049 - Compression Press 4
- nn) Z050 - Compression Press 5
- oo) Z051 - Compression Press 6
- pp) Z052 - Compression Press 7
- qq) Z053 - Compression Press A08
- rr) Z054 - Compression Press A09
- ss) Z055 - Compression Press A10
- tt) Z056 - Compression Press A11
- uu) Z057 - Compression Press A12
- vv) Z058 - Compression Press A13
- ww) Z059 - Compression Press A15
- xx) Z060 - Compression Press A16
- yy) Z061 - Compression Press A17
- zz) Z062 - Compression Press A18
- aaa) Z063 - Compression Press A19
- bbb) Z064 - Compression Press A20
- ccc) Z065 - Compression Press A21
- ddd) Z066 - Compression Press A22
- eee) Z067 - Compression Press A23
- fff) Z068 - Compression Press A24



ggg)	Z069 - Compression Press A25
hhh)	Z070 - Compression Press B02
iii)	Z071 - Compression Press B03
jjj)	Z072 - Compression Press B04
kkk)	Z073 - Compression Press B05
lll)	Z074 - Compression Press B06
mmm)	Z075 - Compression Press B07
nnn)	Z076 - Compression Press B08
ooo)	Z077 - Compression Press B09
ppp)	Z078 - Compression Press B10
qqq)	Z079 - Compression Press B11
rrr)	Z080 - Compression Press B12
sss)	Z081 - Compression Press B13
ttt)	Z082 - Compression Press B14
uuu)	Z083 - Compression Press B15
vvv)	Z084 - Compression Press B16
www)	Z085 - Compression Press B17
xxx)	Z086 - Compression Press B18
yyy)	Z087 - Compression Press B19
zzz)	Z088 - Compression Press B20
aaaa)	Z089 - Compression Press B21
bbbb)	Z090 - Compression Press B22
cccc)	Z091 - Compression Press K28
dddd)	Z093 - Compression Press C03
eeee)	Z094 - Compression Press C04
fff)	Z095 - Compression Press C05
gggg)	Z096 - Compression Press C06
hhhh)	Z097 - Compression Press C07
iiii)	Z098 - Compression Press C08
jjjj)	Z099 - Compression Press C09
kkkk)	Z100 - Compression Press C10
llll)	Z101 - Compression Press C11
mmmm)	Z103 - Compression Press C14
nnnn)	Z104 - Compression Press C16
oooo)	Z105 - Compression Press C17
pppp)	Z106 - Compression Press C18
qqqq)	Z107 - Compression Press C19
rrrr)	Z108 - Compression Press C21
ssss)	Z109 - Compression Press C22
tttt)	Z110 - Compression Press C23
uuuu)	Z111 - Compression Press C24
vvvv)	Z112 - Compression Press C25
wwww)	Z113 - Compression Press C26
xxxx)	Z114 - Compression Press C27
yyyy)	Z115 - Compression Press C28
zzzz)	Z116 - Compression Press D01
aaaaa)	Z117 - Compression Press D02
bbbbb)	Z118 - Compression Press D03
ccccc)	Z119 - Compression Press D04
ddddd)	Z120 - Compression Press D05
eeeee)	Z121 - Compression Press D06



fffff)	Z122 - Compression Press D07
ggggg)	Z123 - Compression Press D08
hhhhh)	Z124 - Compression Press D09
iiiiii)	Z125 - Compression Press D10
jjjjj)	Z126 - Compression Press D11
kkkkk)	Z127 - Compression Press D12
lllll)	Z128 - Compression Press D13
mmmmm)	Z135 - Compression Press L02
nnnnn)	Z136 - Compression Press L03
ooooo)	Z137 - Compression Press L04
ppppp)	Z138 - Compression Press L05
qqqqq)	Z139 - Compression Press L06
rrrrr)	Z129 - Compression Press D14
sssss)	Z142 - Compression Press 97
ttttt)	Z143 - Compression Press 98
uuuuu)	Z144 - Compression Press 99
vvvvv)	Z145 - Compression Press 100
wwwww)	Z146 - Compression Press 101
xxxxx)	Z147 - Compression Press 102
yyyyy)	Z148 - Compression Press 103
zzzzz)	Z149 - Compression Press 104
aaaaaa)	Z150 - Compression Press 105
bbbbbb)	Z151 - Compression Press 106
cccccc)	Z152 - Compression Press 107
dddddd)	Z153 - Compression Press 108
eeeeee)	Z154 - Compression Press 109
ffffff)	Z155 - Compression Press 110
gggggg)	Z156 - Compression Press 111
hhhhhh)	Z157 - Compression Press 112
iiiiii)	Z158 - Compression Press 113
jjjjj)	Z159 - Compression Press 114
kkkkkk)	Z160 - Compression Press 115
lllll)	Z161 - Compression Press 116
mmmmm)	Z162 - Compression Press 117
nnnnn)	Z163 - Compression Press 118
ooooo)	Z164 - Compression Press 119
ppppp)	Z165 - Compression Press 120
qqqqq)	Z166 - Compression Press 121
rrrrr)	Z167 - Compression Press 122
sssss)	Z168 - Compression Press 123
ttttt)	Z169 - Compression Press 124
uuuuu)	Z170 - Compression Press 125
vvvvv)	Z171 - Compression Press 126
wwwww)	Z172 - Compression Press 127
xxxxx)	Z173 - Compression Press 128
yyyyy)	Z174 - Compression Press 129
zzzzz)	Z175 - Compression Press 130
aaaaaaa)	Z176 - Compression Press 131
bbbbbbb)	Z177 - Compression Press 132
ccccccc)	Z178 - Compression Press 133
ddddddd)	Z179 - Compression Press 134



eeeeeee)	Z180 - Compression Press 135
ffffff)	Z181 - Compression Press 136
ggggggg)	Z182 - Compression Press 137
hhhhhhh)	Z183 - Compression Press 138
iiiiiii)	Z184 - Compression Press 139
jjjjjjj)	Z185 - Compression Press 140
kkkkkkk)	Z186 - Compression Press 141
lllllll)	Z187 - Compression Press 142
mmmmmmm)	Z188 - Compression Press 143
nnnnnnn)	Z189 - Compression Press 144
oooooooo)	Z190 - Compression Press 145
ppppppp)	Z191 - Compression Press 146
qqqqqqq)	Z192 - Compression Press 147
rrrrrrr)	Z193 - Compression Press 148
sssssss)	Z194 - Compression Press 149
ttttttt)	Z196 - Compression Press 151
uuuuuuu)	Z197 - Compression Press 152
vvvvvvv)	Z198 - Compression Press 153
wwwwwww)	Z199 - Compression Press 154
xxxxxxx)	Z200 - Compression Press 155
yyyyyyy)	Z201 - Compression Press 156
zzzzzzz)	Z202 - Compression Press 157
aaaaaaaa)	Z203 - Compression Press 158
bbbbbbb)	Z204 - Compression Press 159
ccccccc)	Z205 - Compression Press 160
ddddddd)	Z206 - Compression Press 161
eeeeeee)	Z207 - Compression Press 162
ffffff)	Z208 - Compression Press 163
ggggggg)	Z209 - Compression Press 164
hhhhhhh)	Z210 - Compression Press 165
iiiiiii)	Z211 - Compression Press 166
jjjjjjj)	Z212 - Compression Press 167
kkkkkkk)	Z213 - Compression Press 168
lllllll)	Z214 - Compression Press 169
mmmmmmm)	Z215 - Compression Press 170
nnnnnnn)	Z216 - Compression Press K01
oooooooo)	Z217 - Compression Press K02
ppppppp)	Z218 - Compression Press K03
qqqqqqq)	Z223 - Compression Press K08
rrrrrrr)	Z224 - Compression Press K09
sssssss)	Z225 - Compression Press K10
ttttttt)	Z226 - Compression Press K13
uuuuuuu)	Z227 - Compression Press K14
vvvvvvv)	Z228 - Compression Press K15
wwwwwww)	Z229 - Compression Press K18
xxxxxxx)	Z230 - Compression Press K19
yyyyyyy)	Z231 - Compression Press K20
zzzzzzz)	Z232 - Compression Press K21
aaaaaaaa)	Z235 - Compression Press X15
bbbbbbb)	Z236 - Compression Press C01
ccccccc)	Z237 - Compression Press C02



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

ddddddddd)	Z238 - Hayroll Press 1
eeeeeeeeee)	Z239 - Hayroll Press 2
fffffff)	Z240 - Track Press 1
ggggggggg)	Z241 - Track Press 2
hhhhhhhhh)	Z242 - Track Press 3
iiiiiii)	Z243 - Track Press 4
jjjjjjjj)	Z250 - North Pot Heater
kkkkkkkkk)	Z252 - South Pot Heater
lllllllll)	Z256 - Calender 1
mmmmmmmmm)	Z258 - 10 HF Extruder
nnnnnnnnn)	Z259 - 8 CF Extruder
ooooooooo)	Z260 - 3 CF Extruder
ppppppppp)	Z266 - Slurry Mix Tank
qqqqqqqqq)	Z267 - Slurry Recirculation Tank
rrrrrrrrr)	Z268 - Citrus Degreaser
sssssssss)	Z270 - Pot Heater Blow Down Pit -West
ttttttttt)	Z271 - Boiler Water Softener
uuuuuuuuu)	Z272 - Boiler Blow Down -East
vvvvvvvvv)	Z273 - Boiler Blow Down -West
wwwwwwwww)	Z274 - Chlorinator Tanks
xxxxxxxxx)	Z275 - Cooling Tower 1
yyyyyyyyy)	Z277 - Track Press 5
zzzzzzzzz)	Z278 - Track Press 6
aaaaaaaaa)	Z279 - Track Press 7
bbbbbbbbbb)	Z280 - Track Press 8
ccccccccc)	Z284 - Track Wheel Press
ddddddddd)	Z286 - Track Wheel Press
eeeeeeeeee)	Z287 - Track Wheel Press
fffffff)	Z288 - 3.5 CF Extruder
ggggggggg)	Z303 - Koch Oven 1
hhhhhhhhh)	Z304 - Koch Oven 2
iiiiiii)	Z305 - RT Wheel Cell Blaster
jjjjjjjj)	Z306 - RSRG Blaster
kkkkkkkkk)	Z307 - GOFF Blaster



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. **B003, Boiler #3**

Operations, Property and/or Equipment Description:

90 mmBtu/hr, #6 fuel oil-fired boiler, #2 oil for light off (boiler #3)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-18-12(C)(1)	4.2 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10 (C)(2)	0.24 pound particulate emissions (PE) /mmBtu of actual heat input (for the burning of No. 6 fuel oil, or a combination of No. 6 fuel oil and No. 2 fuel oil) See b)(2)a.
d.	OAC rule 3745-17-10(B)(1)	0.020 pound PE /mmBtu of actual heat input (for the burning of No. 2 fuel oil)
e.	40 CFR 63.52(a)(2)	See b)(2)b.

(2) Additional Terms and Conditions

a. The emission limitation of 0.24 lb PE/mmBtu is based on curve P-2 of Figure I of OAC rule 3745-17-10 and a total heat input capacity of 207 mmBtu/hour (for emissions units B003 and B007, combined). [Emissions units B003 and B007 are united either physically or operationally.]

b. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR



63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.
[40 CFR 63.52(a)(2)]

c) Operational Restrictions

- (1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in b)(1)a.
[OAC 3745-77-07(A)(1)]
- (2) The permittee shall burn only # 6 fuel oil and/or # 2 fuel oil in this emissions unit.
[OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

[OAC 3745-77-07(C)(1)]

- (2) When burning # 6 fuel oil, 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 eliminate the visible emissions.

[OAC 3745-77-07(C)(1)]

- (3) For each day during which the permittee burns a fuel other than # 6 fuel oil and/or # 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC 3745-77-07(C)(1)]



e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1). The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.
[OAC 3745-77-07(C)(1)]
- (2) 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 eliminate visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6 month period.
[OAC 3745-77-07(C)(1)]
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than # 6 fuel oil and/or # 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and visible emissions for PE.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate and visible emissions:

PE: Methods 1 through 5 of 40 CFR, Part 60, Appendix A
Visible PE: Method 9, 40 CFR, Part 60, Appendix A
 - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest 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 Director (the



Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

b. Emission Limitation:

4.2 pounds SO₂/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil meets the limitation.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

[OAC 3745-77-07(C)(1)]

c. Emission Limitation:

0.24 lb PE/mmBtu actual heat input, when firing # 6 fuel oil

Applicable Compliance Method:

Compliance with the PE limitation above shall be determined based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).



The permittee may also demonstrate compliance with the PE limitation above by dividing the emission factor, from AP-42, Table 1.3-1 (revised 09/98), of 10 lbs PE/1000 gallons by the heat content of the #6 fuel oil (150,000 Btu/gallon).
[OAC 3745-77-07(C)(1)]

- d. Emission Limitation:
0.020 pound PE per mmBtu actual heat input, when firing only #2 fuel oil

Applicable Compliance Method:
Compliance with the PE limitation above shall be determined based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

Compliance may also be demonstrated by multiplying the maximum fuel oil capacity of the emissions unit (645 gallons/hr) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (90 mmBtu/hr).
[OAC 3745-77-07(C)(1)]

- g) Miscellaneous Requirements

- (1) None.



2. B007, Boiler #6

Operations, Property and/or Equipment Description:

117 mmBtu/hr, #6 fuel oil-fired boiler, #2 oil for light off (boiler #6)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-18-12(C)(1)	4.2 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10 (C)(2)	0.24 pound particulate emissions (PE) /mmBtu of actual heat input (for the burning of No. 6 fuel oil, or a combination of No. 6 fuel oil and No. 2 fuel oil) See b)(2)a.
d.	OAC rule 3745-17-10(B)(1)	0.020 pound PE /mmBtu of actual heat input (for the burning of No. 2 fuel oil)
e.	40 CFR 63.52(a)(2)	See b)(2)b.

(2) Additional Terms and Conditions

a. The emission limitation of 0.24 lb PE/mmBtu is based on curve P-2 of Figure I of OAC rule 3745-17-10 and a total heat input capacity of 207 mmBtu/hour (for emissions units B003 and B007, combined). [Emissions units B003 and B007 are united either physically or operationally.]

b. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR



63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.
[40 CFR 63.52(a)(2)]

c) Operational Restrictions

- (1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in b)(1)a.
[OAC 3745-77-07(A)(1)]
- (2) The permittee shall burn only # 6 fuel oil and/or or # 2 fuel oil in this emissions unit.
[OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

[OAC 3745-77-07(C)(1)]

- (2) When burning # 6 fuel oil, 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 eliminate the visible emissions.

[OAC 3745-77-07(C)(1)]

- (3) For each day during which the permittee burns a fuel other than # 6 fuel oil and/or # 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC 3745-77-07(C)(1)]



e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1). The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.
[OAC 3745-77-07(C)(1)]
- (2) 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 eliminate visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6 month period.
[OAC 3745-77-07(C)(1)]
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than # 6 fuel oil and/or # 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and visible emissions for PE.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate and visible emissions:

PE: Methods 1 through 5 of 40 CFR, Part 60, Appendix A
Visible PE: Method 9, 40 CFR, Part 60, Appendix A
 - d. The emission testing shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest 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 Director (the



Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest District Office).

[OAC 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

b. Emission Limitation:

4.2 pounds SO₂/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil meets the limitation.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

[OAC 3745-77-07(C)(1)]

c. Emission Limitation:

0.24 lb PE/mmBtu actual heat input, when firing # 6 fuel oil

Applicable Compliance Method:

Compliance with the PE limitation above shall be determined based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).



The permittee may also demonstrate compliance with the PE limitation above by dividing the emission factor, from AP-42, Table 1.3-1 (revised 09/98), of 10 lbs PE/1000 gallons by the heat content of the #6 fuel oil (150,000 Btu/gallon).
[OAC 3745-77-07(C)(1)]

- d. Emission Limitation:
0.020 pound PE per mmBtu actual heat input, when firing only #2 fuel oil

Applicable Compliance Method:
Compliance with the PE limitation above shall be determined based on the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

Compliance may also be demonstrated by multiplying the maximum fuel oil capacity of the emissions unit (645 gallons/hr) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 oil (2.0 lbs PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (90 mmBtu/hr).
[OAC 3745-77-07(C)(1)]

- g) Miscellaneous Requirements

- (1) None.



3. K020, #2 Spindle Cementer

Operations, Property and/or Equipment Description:

#2 spindle cementer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 63.3890(b)(4) [from MACT Subpart Mmmm – 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)
b.	40 CFR 63.1-15 (40 CFR 63 Subpart Mmmm – Appendix)	Table 2 to Subpart Mmmm of 40 CFR Part 63 – Applicability of General Provisions to Subpart Mmmm shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-31-05(A)(3) (PTI 03-5695 issued October 2, 1991)	202 lbs volatile organic compounds (VOC)/day; 30.9 tons VOC /yr See b)(2)f and c)(1).
d.	OAC rule 3745-21-09(U)(2)(f)	See b)(2)a.
e.	OAC rule 3745-17-11(B)(2)	None [See b)(2)b and b)(2)e.]
f.	OAC rule 3745-17-07 (A)	None [See b)(2)c and b)(2)e.]
g.	OAC rule 3745-17-11(C)	See b)(2)d and c)(2).

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI 03-5695, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. (Note: SIP approval pending, for this determination for this emissions unit)

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Auglaize County.



- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(2) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- f. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- g. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in emissions units K006, K007, K008, K011, K014, and K020, combined, and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the emissions units is less than or equal to the applicable emission limit in b)(1)a, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for the emissions units meet the operating limits required in c)(3), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(4). The permittee must meet all the requirements of f)(2) to demonstrate compliance with the emission limits, operating limits, and work practice standards.
[40 CFR 63.3891(c)]
- h. The permittee must be in compliance with the applicable emission limitation in b)(1)a as specified in h.i through h.iii as follows:
 - i. The emissions units must be in compliance with the applicable emission limit in b)(1)a at all times except during periods of startup, shutdown, and malfunction.
 - ii. The emissions units must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(3) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).
 - iii. The emissions units must be in compliance with the work practice standards in c)(4) at all times.
[40 CFR 63.3900 (a)(2)]



- i. The permittee must always operate and maintain the emissions unit, including all air pollution control and monitoring equipment used for purposes of complying with Subpart Mmmm, according to the provisions in 40 CFR 63.6(e)(1)(i).
[40 CFR 63.3900 (b)]
 - j. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.
[40 CFR 63.3900 (c)]
- c) Operational Restrictions
- (1) Coating usage for this emissions unit shall not exceed 416 gallons/month of primer coat and 520 gallons/month of top coat.
[OAC 3745-31-05(A)(3) and 3745-77-07(A)(1)]
 - (2) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:
 - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
 - b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.



- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c)(2)a shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC 3745-77-07(A)(1) and OAC 3747-17-11(C)]

- (3) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:
 - a. The minimum combustion temperature operating limit for the thermal oxidizer has been determined to be 1590 deg F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.
 - b. The minimum temperature operating limit for the desorption concentrate gas stream has been determined to be 118 deg F. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit.
 - c. The minimum pressure drop operating limit for the dilute stream across the concentrator has been determined to be 0.5 inches of water. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limits specified above at all times.

[40 CFR 63.3892 (b), and 40 CFR 63.3967 (a) and (e), and Table 1 to Subpart Mmmm (1, 5a, 5b); and OAC 3745-77-07(A)(1)]

- (4) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the elements specified in (4)a through (4)e are implemented.
 - a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.
 - b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.



- c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
 - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
 - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
[40 CFR 63.3893(b) and OAC 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
- (5) The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. identification of whether the coating is a prime coat or top coat;
 - c. the VOC content of each coating employed, in pounds/gallon, as applied;
 - d. the number of gallons of each coating employed;
 - e. the total emissions of VOC from each coating employed [d)(1)c x d)(1)d], in pounds;
 - f. the total emissions of VOC from all the coatings employed [summation of d)(1)e for all coatings], in pounds;
 - g. the total number of gallons of top coats employed [summation of d)(1)d for all top coats]; and
 - h. the total number of gallons of prime coats employed [summation of d)(1)d for all prime coats].
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]
 - (6) The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the number of gallons of all the top coatings employed [summation of d)(1)g, for the calendar month];
 - b. the number of gallons of all the prime coatings employed [summation of d)(1)h, for the calendar month];
 - c. the total VOC emissions for all the coating materials employed, in pounds [summation of d)(1)f, for the calendar month]; and
 - d. the annual year-to-date VOC emissions, in tons, from all the cleanup materials employed [summation of d)(2)c, for each calendar month to date from January to December].



[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3968(a)(1) through (6) - operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)

63.3968(a)(7) - definition of monitoring malfunction

63.3968(b) - capture system bypass line monitoring

63.3968(c) - thermal oxidizer monitor specifications

63.3968(f) - gas concentrator specifications

63.3930(a) - records (copies) of compliance notification reports

63.3930(b) - current records of coating manufacturer /supplier HAP information

63.3930(c)(1), (2), and (3) - records of calculation(s) for compliance

63.3930(d), (e), (f), and (g) - records of coating material types and volumes used, and HAP and solids content, and density (as applicable)

63.3930(j) - deviation records retention

63.3930(k)(1) - deviation records for add-on controls

63.3930(k)(2) - startup, shutdown, and malfunction records

63.3930(k)(3) - operating limit continuous compliance records

63.3930(k)(4) - Permanent Total Enclosure (PTE) criteria determination documentation

63.3930(k)(6) and (7) - control device performance test records

63.3930(k)(8) - work practice plan records

63.3931 - records retention (general)

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the daily VOC emission limitation of 202 pounds; and

b. all exceedances of the monthly gallon usage restrictions of 416 and 520 (for primer coatings and top coats, respectively).



These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

(2) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from coating operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3920(a)(2) - semi-annual reports (as in Part I - General Terms and Conditions)

63.3920(a)(3) - reporting requirements (general)

63.3920(a)(4), (7) - deviation reporting requirements (general)

63.3920(b) - performance test reports

63.3920(c) - startup, shutdown, malfunction reports

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method:

Emission Limitation:

202 lbs VOC/day, 30.9 tons VOC /yr

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in d)(1) and d)(2), respectively. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of all the coatings.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart M, including the following sections:

63.3960, 3961, and 3963 - compliance requirements for the emission rate with add-on controls option

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

g) Miscellaneous Requirements

(1) None.



4. K030, #3 Paint Booth

Operations, Property and/or Equipment Description:

Binks spray booth, booth #3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 63.3890(b)(1) [from MACT Subpart M MMM - 40 CFR 63.3880 et seq.]	2.6 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) [for emissions units K030 and K031, combined - See b)(2)e)]
b.	40 CFR 63.1-15 (40 CFR 63 Subpart M MMM – Appendix)	Table 2 to Subpart M MMM of 40 CFR Part 63 – Applicability of General Provisions to Subpart M MMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-21-09 (U)(2)(e)(iii)	See b)(2)a
d.	OAC rule 3745-17-11(B)	None [See b)(2)b and b)(2)e.]
e.	OAC rule 3745-17-07(A)	None [See b)(2)c and b)(2)e.]
f.	OAC rule 3745-17-11(C)	See b)(2)d and c)(1).
g.	OAC rule 3745-31-05(A)(3) (PTI 03-2106 issued June 26, 1985)	None [See b)(2)h.]

(2) Additional Terms and Conditions

a. The permittee shall not employ more than ten gallons of coating material per day for the coating of miscellaneous metal parts in this emissions unit.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.

c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.



- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
 - e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
 - f. The permittee shall:
 - i. Demonstrate that the organic HAP content of each coating used in this emissions unit is less than or equal to the applicable emission limit in b)(1)a, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942, to demonstrate compliance with the applicable emission limit using this option; or
 - ii. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials, used in emissions units K030 and K031 combined, the organic HAP emission rate is less than or equal to the applicable emission limit in b)(1)a, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.
[40 CFR 63.3891(a) and (b)]
 - g. This emissions unit, under the compliant material option or the emission rate without add-on controls option as specified in b)(2)f above, must be in compliance with the applicable emission limit in b)(1)a at all times.
[40 CFR 63.3900 (a)(1)]
 - h. No specific Best Available Technology (BAT) requirements or emission limitations were established in this Permit to Install for this emissions unit.
- c) Operational Restrictions
- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:
 - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
 - b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.



- c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c)(1)a shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.
[OAC 3745-77-07(A)(1) and OAC 3747-17-11(C)]

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

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed;
 - b. The volume, in gallons, of each coating employed; and
 - c. The total volume, in gallons, of all coatings employed.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]
- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart M, including the following sections:
 - 63.3930(a) - records (copies) of compliance notification reports
 - 63.3930(b) - current records of coating manufacturer /supplier HAP information
 - 63.3930(c)(1), (2), and (3) - records of calculation(s) for compliance



63.3930(d), (e), (f), and (g) - records of coating material types and volumes used, and HAP and solids content, and density (as applicable)

63.3930(j) - deviation records retention

63.3931 - records retention (general)
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]]

e) Reporting Requirements

(1) The permittee shall notify the Northwest District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3920(a)(2) - semi-annual reports (as in Part I - General Terms and Conditions)

63.3920(a)(3) - reporting requirements (general)

63.3920(a)(4), (5), and (6) - deviation reporting requirements (general)
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]]

f) Testing Requirements

(1) Compliance with the emission limitation in b)(1) shall be determined in accordance with the following method:

Emission Limitation:

Coating usage shall not exceed 10 gallons per day

Applicable Compliance Method:

Compliance with the coating usage restriction shall be based upon the recordkeeping requirements specified in d)(1)c.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart M, including the following sections:

63.3940, 3941, and 3942 - compliance requirements for the compliant material option

63.3950, 3951, and 3952 - compliance requirements for the emission rate without add-on controls option

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



5. K031, #5 Spindle Painter

Operations, Property and/or Equipment Description:

metal parts spray coating operation (for the metal substrate on rubber/metal parts), spindle painter #5

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-8794 issued January 4, 1996)	81.6 lbs volatile organic compounds (VOC)/day, from coatings 5.21 tons VOC/yr (including cleanup) See b)(2)a
b.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC /gallon of coating, excluding water and exempt solvents, for extreme performance coatings
c.	40 CFR 63.3890(b)(1) [from MACT Subpart M - 40 CFR 63.3880 et seq.]	2.6 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) [for emissions units K030 and K031, combined - See b)(2)e]
d.	40 CFR 63.1-15 (40 CFR 63 Subpart M - Appendix)	Table 2 to Subpart M of 40 CFR Part 63 - Applicability of General Provisions to Subpart M shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
e.	OAC rule 3745-17-11(B)	None [See b)(2)b and b)(2)e.]
f.	OAC rule 3745-17-07(A)	None [See b)(2)c and b)(2)e.]
g.	OAC rule 3745-17-11(C)	See b)(2)d and c)(1).

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii),



Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.

- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- f. The permittee shall:
 - i. Demonstrate that the organic HAP content of each coating used in this emissions unit is less than or equal to the applicable emission limit in b)(1)c, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942, to demonstrate compliance with the applicable emission limit using this option; or
 - ii. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials, used in emissions units K030 and K031 combined, the organic HAP emission rate is less than or equal to the applicable emission limit in b)(1)c, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.
[40 CFR 63.3891(a) and (b)]
- g. This emissions unit, under the compliant material option or the emission rate without add-on controls option as specified in b)(2)f above, must be in compliance with the applicable emission limit in b)(1)c at all times.
[40 CFR 63.3900 (a)(1)]

c) Operational Restrictions

- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:
 - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.



- b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c)(1)a shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC 3745-77-07(A)(1) and OAC 3747-17-11(C)]

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

- (1) The permittee shall calculate and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2.];
 - d. the VOC content of each coating employed (including water and exempt solvents) in lbs/gallon, as applied;
 - e. the total emissions of VOC from each coating employed [d)(1)b x d)(1)d], in pounds; and



- f. the total emissions of VOC from all the coatings employed [summation of d)(1)e for all coatings], in pounds.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]
- (2) The permittee shall calculate and record the following information each month for this emissions unit:
- a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in pounds/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total emissions of VOC from each cleanup material employed [d)(2)b x d)(2)c], in pounds; and
 - e. the total emissions of VOC from all the cleanup materials employed [summation of d)(2)d for all cleanup materials], in pounds;
 - f. the total emissions of VOC from all the coatings employed [summation of the daily VOC emission rates, from d)(1)e, for the calendar month], in pounds;
 - g. the total VOC emissions from all the coatings and cleanup materials employed [d)(2)e + d)(2)f], in pounds; and
 - h. the annual year-to-date VOC emissions, in tons, from all the coatings and cleanup materials employed [summation of d)(2)g for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart M, including the following sections:
- 63.3930(a) - records (copies) of compliance notification reports
 - 63.3930(b) - current records of coating manufacturer /supplier HAP information
 - 63.3930(c)(1), (2), and (3) - records of calculation(s) for compliance
 - 63.3930(d), (e), (f), and (g) - records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
 - 63.3930(j) - deviation records retention
 - 63.3931 - records retention (general)



[OAC 3745-77-07(C)(1) and 40 CFR 63 Subpart M] M M M M]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily VOC limit of 81.6 lbs

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (2) The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.5 lbs of VOC/gallon of coating, as applied) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

[OAC 3745-77-07(C)(1), OAC 3745-21-09(B)(3)(g), and OAC rule 3745-31-05(A)(3)]

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3920(a)(2) - semi-annual reports (as in Standard Terms and Conditions)

63.3920(a)(3) - reporting requirements (general)

63.3920(a)(4), (5), and (6) - deviation reporting requirements (general)

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1.c of this permit.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- b. Emission Limitations:
81.6 lbs VOC/day, 5.21 tons VOC/yr (including cleanup)

Applicable Compliance Method:

The record keeping requirements established in d)(1) shall be used to demonstrate compliance with the daily allowable VOC emission limitation.



The record keeping requirements established in d)(1) and d)(2) shall be used to demonstrate compliance with the annual allowable VOC emission limitation.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart M, including the following sections:

63.3940, 3941, and 3942 - compliance requirements for the compliant material option

63.3950, 3951, and 3952 - compliance requirements for the emission rate without add-on controls option

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

- g) Miscellaneous Requirements

- (1) None.



6. K033, #3 Spindle Cementer

Operations, Property and/or Equipment Description:

primer and adhesive coating operation with preheat ovens & dry filtration

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5) through d)(8).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-13346 issued February 9, 2000)	For primer coating: 61.8 lbs volatile organic compounds (VOC)/day, 11.3 tons VOC/yr For adhesive coating: 64.0 lbs VOC/day, 11.7 tons VOC/yr For clean-up operations: 6.76 lbs VOC/month, 0.04 ton VOC/yr See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	maximum primer coating usage of 10 gallons/day [See b)(2)b.] maximum adhesive coating usage of 10 gallons/day [See b)(2)b.]
c.	40 CFR 63.3890(b)(4) [from MACT Subpart Mmmm – 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) [See b)(2)g.]
d.	40 CFR 63.1-15 (40 CFR 63 Subpart Mmmm – Appendix)	Table 2 to Subpart Mmmm of 40 CFR Part 63 – Applicability of General Provisions to Subpart Mmmm shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
e.	OAC rule 3745-17-11(B)	None [See b)(2)c and b)(2)f.]
f.	OAC rule 3745-17-07(A)	None [See b)(2)d and b)(2)f.]
g.	OAC rule 3745-17-11(C)	See b)(2)e and c)(1).



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).
- b. This emissions unit consists of a primer coating operation and an adhesive coating operation separated by a drying oven, with each coating operation being subject to the coating usage limitation of 10 gallons per day [per OAC rule 3745-21-09 (U)(2)(e)]. Both coating operations meet the definition of a coating line per OAC rule 3745-21-01 (D)(10).

The permittee shall not employ more than ten gallons of coating material per day for the coating of miscellaneous metal parts, in either coating line, in this emissions unit.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.
- d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- f. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- g. The permittee shall:
 - i. Demonstrate that the organic HAP content of each coating used in this emissions unit is less than or equal to the applicable emission limit in b)(1)c, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942, to demonstrate compliance with the applicable emission limit using this option; or
 - ii. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials, used in emissions units K003, K004, K005, K012, K013, K015, K019, and K033, combined, the organic HAP emission rate is less than or equal to the applicable emission limit in b)(1)c, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.3950,



63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

[40 CFR 63.3891(a) and (b)]

- h. This emissions unit, under the compliant material option or the emission rate without add-on controls option as specified in b)(2)g above, must be in compliance with the applicable emission limit in b)(1)c at all times.

[40 CFR 63.3900 (a)(1)]

c) Operational Restrictions

- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:

- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

- b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.

- c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c)(1)a shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC 3745-77-07(A)(1) and OAC 3747-17-11(C)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the primer coating operation associated with this emissions unit:
 - a. The name and identification number of each coating material employed.
 - b. The volume, in gallons, of each coating material employed.
 - c. The total volume, in gallons, of all the coating materials employed.
 - d. The VOC content of each coating material employed, in lbs/gallon.
 - e. The VOC emission rate for each coating employed [d)(1)b x d)(1)d], in pounds.
 - f. The total VOC emission rate for all the coatings employed [summation of d)(1)e for all coatings], in pounds.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]
- (2) The permittee shall collect and record the following information each day for the adhesive coating operation associated with this emissions unit:
 - a. The name and identification number of each coating material employed.
 - b. The volume, in gallons, of each coating material employed.
 - c. The total volume, in gallons, of all the coating materials employed.
 - d. The VOC content of each coating material employed, in lbs/gallon.
 - e. The VOC emission rate for each coating employed [d)(2)b x d)(2)d], in pounds.
 - f. The total VOC emission rate for all the coatings employed [summation of d)(2)e for all coatings], in pounds.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]
- (3) The permittee shall collect and record the following information each month for the cleanup operations associated with this emissions unit:
 - a. The name and identification number of each cleanup material.
 - b. The VOC content of each cleanup material employed, in pounds/gallon, as applied.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC emission rate for each cleanup material employed [d)(3)b x d)(3)c], in pounds.
 - e. The total VOC emission rate for all the cleanup materials employed [summation of d)(3)d for all cleanup materials], in pounds.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:



OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3930(a) - records (copies) of compliance notification reports

63.3930(b) - current records of coating manufacturer /supplier HAP information

63.3930(c)(1), (2), and (3) - records of calculation(s) for compliance

63.3930(d), (e), (f), and (g) - records of coating material types and volumes used, and HAP and solids content, and density (as applicable)

63.3930(j) - deviation records retention

63.3931 - records retention (general)

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

- (5) The permit to install for this emission unit was evaluated based on the actual materials (coatings and clean-up materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene*

TLV (µg/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 3.50

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 136

MAGLC (µg/m3): 4476

* The following additional conservative assumptions were made in the Screen modeling:

For this emissions unit, the remaining emissions of toxic compounds in the coatings or cleanup materials were assumed to be toluene which has the lowest TLV of the remaining toxic compounds emitted in excess of 1 TPY.

- (6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.



Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (7) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- (8) The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
- a. all exceedances of the daily VOC emission limitations of 61.8 pounds and 64.0 pounds (for the primer coating operation and the adhesive coating operation, respectively); and
 - b. all exceedances of the monthly VOC emission limitation of 6.76 pounds (for the cleanup operations).



These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of each daily record showing an exceedance of the maximum daily coating usage limitation of 10 gallons (for the primer coating operation and/or for the adhesive coating operation). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3920(a)(2) - semi-annual reports (as in Part I - General Terms and Conditions)

63.3920(a)(3) - reporting requirements (general)

63.3920(a)(4), (5), and (6) - deviation reporting requirements (general)

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitations:

61.8 lbs VOC/day; 11.3 tons VOC/yr (for primer coating)

64.0 lbs VOC/day; 11.7 tons VOC/yr (for adhesive coating)

Applicable Compliance Method: Compliance with the daily allowable VOC emission limitations shall be based upon the record keeping requirements specified in d)(1) and d)(2), respectively.

The annual allowable OC limitation was developed by multiplying the daily limitation by 365, and then dividing by 2000. Therefore, if compliance is shown with the daily limitation, compliance is shown with the annual limitation.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

b. Emission Limitation:

Coating material usage shall not exceed 10 gallons per day (primer coating)

Coating material usage shall not exceed 10 gallons per day (adhesive coating)

Applicable Compliance Method: Compliance with the coating usage restrictions shall be based upon the recordkeeping requirements specified in d)(1)c and d)(2)c, respectively.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

c. Emission Limitations:

6.76 lbs VOC/month; 0.04 tons VOC/yr (clean-up operations)



Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitations shall be based upon the record keeping requirements specified in d)(3).

The annual allowable OC limitation was developed by multiplying the monthly limitation by 12, and then dividing by 2000. Therefore, if compliance is shown with the monthly limitation, compliance is shown with the annual limitation.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart M MMM, including the following sections:

63.3940, 3941, and 3942 - compliance requirements for the compliant material option

63.3950, 3951, and 3952 - compliance requirements for the emission rate without add-on controls option

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M MMM]

g) **Miscellaneous Requirements**

- (1) None.



7. P001, Rust Inhibitor

Operations, Property and/or Equipment Description:

rust inhibitor dip tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09 (U)(1)(c)	3.5 pounds volatile organic compound (VOC) per gallon of coating, excluding water and exempt solvents [See b)(2)a.]

(2) Additional Terms and Conditions

a. The permittee adds organic materials to the dip tank under the following scenarios:

- i. during the day, only compliant materials are added;
- ii. during the day, both compliant, and noncompliant materials (i.e. thinner / make-up solvent) are added; and
- iii. during the day, only noncompliant materials or mixtures of materials are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under d) of this permit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the dip tank:

- a. the name and identification number of each material added to the dip tank;



- b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank; and
- c. the number of gallons of each material added to the dip tank, excluding water and exempt solvents.

[OAC 3745-77-07(C)(1)]

- (2) On the days when a mixture of materials are added to the dip tank, the permittee shall record the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [(summation of b)(2)b x b)(2)c for all materials) divided by (the total number of gallons, excluding water and exempt solvents, of all materials added to the system)].

[OAC 3745-77-07(C)(1)]

- (3) On the days when a noncompliant material or mixture of materials is added to the dip tank and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the permittee shall record the VOC content of the entire tank, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-addition grab sample from the (well-mixed) dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section f)(2)a this permit.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coating materials (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitation in b)(1) shall be determined in accordance with the following method:

Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents (including daily volume-weighted average)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.

The daily, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Daily volume-weighted average =

$$[\sum (G_i \times \text{VOC}_i)] / [\sum G_i] \text{ for } i = 1 \text{ to } n$$



where:

$i = 1, 2, 3, \dots n$

n = the total number of the different types of materials added to the dip tank for that day

G_i = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOC_i = the VOC content of material i , in pounds/gallon of material, excluding water and exempt solvents

[OAC 3745-77-07(C)(1)]

(2) Determining VOC contents of the coating materials:

a. Any determination of VOC content, solids content, or density of a coating material added to the paint tank shall be based on the coating material, as received, including the use of any thinning or viscosity reducer. The permittee shall determine the composition of the coating materials by formulation data supplied by the manufacturer of the material or from data determined by an analysis of each coating material, as received, by Reference Method 24 of 40 CFR, Part 60, Appendix A. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine the VOC contents of the coating materials by Reference Method 24 or an equivalent or USEPA-approved alternative method.

b. For the VOC contents of the samples taken from the dip tank pursuant to d)(3), the permittee shall determine the composition of the coatings through the use of USEPA Method 24 of 40 CFR, Part 60, Appendix A, and, if the permittee elects, an equivalent or USEPA-approved alternative method to confirm the Method 24 test result.

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



8. P005, Banbury #2

Operations, Property and/or Equipment Description:

banbury (rubber) mixer #2 (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	28.4 lbs particulate emissions (PE)/hr (for emissions units P005, P017, and P083, combined)
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-21-07(G)	None [See b)(2)b.]

(2) Additional Terms and Conditions

a. The PE limitation of 28.4 lbs/hr represents an allowable PE rate for emissions units P005, P017, and P083, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P005, P017, and P083, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

b. This emissions unit is located in Auglaize County (which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06) and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP).



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation:
28.4 lbs PE/hr (for emissions units P005, P017, and P083, combined)

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [determined by the permittee] of 1.2 lbs PE/100 lbs of solid materials used by the total combined maximum raw solid material usage rate (22,825 lbs/hr), and then multiplying by a control factor of (1 - 0.98).*

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* The control efficiency of the baghouse is assumed to be 98%.
[OAC 3745-77-07(C)(1)]
 - b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
[OAC 3745-77-07(C)(1)]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

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g) Miscellaneous Requirements

(1) None.



9. P017, Banbury #1

Operations, Property and/or Equipment Description:

banbury (rubber) mixer #1 (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) (PTI 03-10885)	0.07 lb particulate emissions (PE)/hr; 0.32 ton PE/yr 1.78 lbs organic compounds (OC)/hr; 7.82 tons OC/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	28.4 lbs particulate emissions (PE)/hr (for emissions units P005, P017, and P083, combined)
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-21-07(G)	None [See b)(2)c.]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).

Best available technology (BAT) has been determined to be the use of a baghouse to control all the PE from this emissions unit.

b. The PE limitation of 28.4 lbs/hr represents an allowable PE rate for emissions units P005, P017, and P083, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P005, P017, and P083, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]



- c. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in *Ashland Chem. Co. v. Jones* (2001), 92 Ohio St.3.d 234, i.e. this emissions unit does not employ, apply, evaporate or dry liquid organic materials.
- d. The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no hourly monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this limit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or



local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
- b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitations:
0.07 lb PE/hr, 0.32 TPY PE (for this emissions unit)

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99)] of 0.0009 lb PE/lb rubber by the maximum raw material usage rate (8300 lbs/hr), and then multiplying by a control factor of (1 - 0.99).*

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.



If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

* The control efficiency of the baghouse is assumed to be 99%.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- b. Emission Limitation:
28.4 lbs PE/hr (for emissions units P005, P017, and P083, combined)

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [determined by the permittee] of 1.2 lbs PE/100 lbs of solid materials used by the total combined maximum raw solid material usage rate (22,825 lbs/hr), and then multiplying by a control factor of (1 - 0.98).*

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

* The control efficiency of the baghouse is assumed to be at least 98%.
[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- c. Emission Limitations:
1.78 lbs OC/hr and 7.82 TPY OC

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable OC emission limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99)] of 0.000215 lb OC/lb rubber by the maximum raw material usage rate (8300 lbs/hr).

Compliance with the annual OC emission limitation shall be assumed as long as compliance with the hourly OC emission limitation is maintained (the annual OC emission limitation was determined by multiplying the hourly OC emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall determine compliance with the hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- d. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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g) Miscellaneous Requirements

(1) None.



10. P021, Tumbler #1

Operations, Property and/or Equipment Description:

"Tumbler" #1 abrasive blaster - with baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	16.7 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:
16.7 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the maximum volumetric air flow rate (6500 acfm), and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer
[OAC 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).
[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



11. P022, Tumbler #2

Operations, Property and/or Equipment Description:

"Tumbler" #2 abrasive blaster - with 2 baghouses in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	67.9 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The PE limitation of 67.9 lbs/hr represents an allowable PE rate for emissions units P022, P023, P025, P026, and P028, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P022, P023, P025, P026, and P028, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee



shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
67.9 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the total maximum volumetric air flow rate (32,500 acfm)**, and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

** the 32,500 acfm is the maximum volumetric air flow rate for emissions units P022, P023, P025, P026 and P028, combined

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



12. P023, Tumbler #3

Operations, Property and/or Equipment Description:

"Tumbler" #3 abrasive blaster - with 2 baghouses in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	67.9 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The PE limitation of 67.9 lbs/hr represents an allowable PE rate for emissions units P022, P023, P025, P026, and P028, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P022, P023, P025, P026, and P028, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee



shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
67.9 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the total maximum volumetric air flow rate (32,500 acfm)**, and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

** the 32,500 acfm is the maximum volumetric air flow rate for emissions units P022, P023, P025, P026 and P028, combined

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



13. P025, Tumbler #5

Operations, Property and/or Equipment Description:

"Tumbler" #5 abrasive blaster - with 2 baghouses in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	67.9 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The PE limitation of 67.9 lbs/hr represents an allowable PE rate for emissions units P022, P023, P025, P026, and P028, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P022, P023, P025, P026, and P028, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee



shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
67.9 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the total maximum volumetric air flow rate (32,500 acfm)**, and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

** the 32,500 acfm is the maximum volumetric air flow rate for emissions units P022, P023, P025, P026 and P028, combined

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



14. P026, Shot Peening Machine

Operations, Property and/or Equipment Description:

Shot Peening Machine #1, with 2 baghouses in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	67.9 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The PE limitation of 67.9 lbs/hr represents an allowable PE rate for emissions units P022, P023, P025, P026, and P028, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P022, P023, P025, P026, and P028, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee



shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
67.9 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the total maximum volumetric air flow rate (32,500 acfm)**, and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

** the 32,500 acfm is the maximum volumetric air flow rate for emissions units P022, P023, P025, P026 and P028, combined

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



15. P028, Shot Peening Machine

Operations, Property and/or Equipment Description:

Shot Peening Machine #2, with 2 baghouses in series

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	67.9 lbs particulate emissions (PE)/hr [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The PE limitation of 67.9 lbs/hr represents an allowable PE rate for emissions units P022, P023, P025, P026, and P028, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P022, P023, P025, P026, and P028, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee



shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the primary baghouse is 1.0 to 8.0 inches of water.

The acceptable range for the pressure drop across the secondary baghouse is 0.5 to 4.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
67.9 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying a maximum outlet concentration of 0.02 grain/dscf* by the total maximum volumetric air flow rate (32,500 acfm)**, and dividing by 7000, and then multiplying by 60.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* based on information supplied by the manufacturer

** the 32,500 acfm is the maximum volumetric air flow rate for emissions units P022, P023, P025, P026 and P028, combined

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



16. P034, Empty Bag Collector

Operations, Property and/or Equipment Description:

empty bag collector (with cyclone)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	4.36 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-31-05 (A)(3) (PTI 03-2106 issued June 26, 1985)	See b)(2)a.

(2) Additional Terms and Conditions

a. No specific Best Available Technology (BAT) requirements or emission limitations were established in this Permit to Install for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping 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.

[OAC 3745-77-07(C)(1)]

e) 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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitations:
4.36 lb PE /hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [conservatively estimated] of 10 lbs PE/100 lbs of solid materials remaining in bags by the maximum amount of solids remaining in bags (200 lbs/hr), and then multiplying by a control factor of (1 - 0.90).*

If required, the permittee shall demonstrate compliance with hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

* The control efficiency of the cyclone is assumed to be 90%.

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements:

(1) None



17. P066, Banbury Chemical Blending Equipment

Operations, Property and/or Equipment Description:

banbury chemical blending equipment (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) (PTI 03-6916 issued January 13, 1993)	0.48 lb particulate emissions (PE)/hr; 2.10 ton PE/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	None [See b)(2)b.]
c.	OAC rule 3745-17-07(A)	None [See b)(2)c.]

(2) Additional Terms and Conditions

a. Best available technology (BAT) has been determined to be the use of a baghouse to control all the PE from this emissions unit.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.

c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and



operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

Emission Limitations:

0.48 lb PE/hr, 2.10 TPY PE

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99)] of 0.0009 lb PE/lb rubber by the maximum raw material usage rate (800 lbs/hr), and then multiplying by a control factor of (1 - 0.99).*

* The control efficiency of the baghouse is assumed to be 99%.

Compliance with this emission limitation (in conjunction with emissions unit P080) was demonstrated with the results of emissions testing conducted on April 10, 2008.

If required, the permittee shall conduct any future compliance demonstration with the emission limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



18. P080, Banbury Bagging and Chemical Weighup

Operations, Property and/or Equipment Description:

banbury chemical bagging and weighing area (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) (PTI 03-8008 issued June 30, 1994)	0.24 lb particulate emissions (PE)/hr; 1.05 ton PE/yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).

Best available technology (BAT) has been determined to be the use of a baghouse to control all the PE from this emissions unit.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and



operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;



- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitations:
0.24 lb PE/hr, 1.05 TPY PE (for this emissions unit)

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [provided by the Rubber Manufacturing Association (revised 06/99)] of 0.0009 lb PE/lb rubber by the maximum raw material usage rate (2000 lbs/hr), and then multiplying by a control factor of (1 - 0.99).*

* The control efficiency of the baghouse is assumed to be 99%.

Compliance with this emission limitation (in conjunction with emissions unit P066) was demonstrated with the results of emissions testing conducted on April 10, 2008.

If required, the permittee shall conduct any future compliance demonstration with the emission limitation in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-31-05(A)(3) and 3745-77-07(C)(1)]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0086804

Facility ID: 0306010138

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements:

(1) None.



19. P083, Banbury #4

Operations, Property and/or Equipment Description:

banbury (rubber) mixer #4 (with baghouse)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	28.4 lbs particulate emissions (PE)/hr (for emissions units P005, P017, and P083, combined)
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-21-07(G)	None [See b)(2)b.]

(2) Additional Terms and Conditions

a. The PE limitation of 28.4 lbs/hr represents an allowable PE rate for emissions units P005, P017, and P083, combined. The allowable PE limitation (from Figure II of OAC rule 3745-17-11) was based on the maximum uncontrolled emission rate for emissions units P005, P017, and P083, combined (these emissions units are united either physically or operationally). [Table I does not apply since the facility is located in Auglaize County.]

b. This emissions unit is located in Auglaize County (which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06) and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse(s) during operation of this



emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations. [Note that the permittee has automatic alarm systems in place.]

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

The pressure drop range shall apply at all times, except during periods of rebagging and/or until sufficient filter cake is developed on the bags.

This range(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a 'minor' permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);



- b. an identification of each incident of deviation described in e)(1)a where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
28.4 lbs PE/hr (for emissions units P005, P017, and P083, combined)

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable PE limitation by multiplying the emission factor [determined by the permittee] of 1.2 lbs PE/100 lbs of solid materials used by the total combined maximum raw solid material usage rate (22,825 lbs/hr), and then multiplying by a control factor of (1 - 0.98).*

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

* The control efficiency of the baghouse is assumed to be 98%.

[OAC 3745-77-07(C)(1)]

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



20. Emissions Unit Group - Variance - control: K006, K007, K008, K011, K014,

EU ID	Operations, Property and/or Equipment Description
K006	#6 cement booth (adhesives) - rubber and metal - conveyORIZED automated spray - with filters - with (optional) thermal oxidizer
K007	#7 cement booth (adhesives) - rubber and metal - conveyORIZED automated spray - with filters - with (optional) thermal oxidizer
K008	#1 spindle cementer (adhesives) - rubber and metal - conveyORIZED automated spray - with filters - with (optional) thermal oxidizer
K011	#11 cementer (adhesives) - rubber and metal - conveyORIZED automated spray - with filters - with (optional) thermal oxidizer
K014	#14 cementer (adhesives) - rubber and metal - conveyORIZED automated spray - with filters - with (optional) thermal oxidizer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 52.1870(c)(84) (54 FR 32637) (variance)	255 tons volatile organic compounds (VOC)/year [for emissions units K003 thru K008, K011 thru K015, and K019, combined - See b)(2)a.]
b.	40 CFR 63.3890(b)(4) [from MACT Subpart Mmmm - 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) [See b)(2)f.]
c.	40 CFR 63.1-15 (40 CFR 63 Subpart Mmmm - Appendix)	Table 2 to Subpart Mmmm of 40 CFR Part 63 - Applicability of General Provisions to Subpart Mmmm shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-17-11(B)	None [See b)(2)b and b)(2)e.]
e.	OAC rule 3745-17-07(A)	None [See b)(2)c and b)(2)e.]
f.	OAC rule 3745-17-11(C)	See b)(2)d and c)(1).

(2) Additional Terms and Conditions

a. This emissions unit does not have to comply with the requirements of OAC rule 3745-21-09 (U) because of the variance. In lieu of the requirements of OAC rule



3745-21-09 (U), the permittee shall limit the total VOC emissions from emissions units K003 thru K008, K011 thru K015, and K019, combined, to 255 tons/year.

- b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.
- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- f. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in emissions units K006, K007, K008, K011, K014, and K020, combined, and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the emissions units is less than or equal to the applicable emission limit in Section b)(1)b above, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for the emissions units meet the operating limits required in c)(2), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(3). The permittee must meet all the requirements of f)(3) to demonstrate compliance with the emission limits, operating limits, and work practice standards.
[40 CFR 63.3891(c)]
- g. The permittee must be in compliance with the applicable emission limitation in Section b)(1)b as specified in g.i through g.iii as follows:
 - i. The emissions units must be in compliance with the applicable emission limit in b)(1)b at all times except during periods of startup, shutdown, and malfunction.
 - ii. The emissions units must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(2) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).



- iii. The emissions units must be in compliance with the work practice standards in c)(3) at all times.
[40 CFR 63.3900 (a)(2)]
 - h. The permittee must always operate and maintain the emissions unit, including all air pollution control and monitoring equipment used for purposes of complying with Subpart M, according to the provisions in 40 CFR 63.6(e)(1)(i).
[40 CFR 63.3900 (b)]
 - i. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.
[40 CFR 63.3900 (c)]
- c) Operational Restrictions
- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:
 - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
 - b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c)(1)a shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC 3745-77-07(A)(1) and OAC 3747-17-11(C)]

- (2) During the performance test (December 14, 2006) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:
 - a. The minimum combustion temperature operating limit for the thermal oxidizer has been determined to be 1590 deg F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.
 - b. The minimum temperature operating limit for the desorption concentrate gas stream has been determined to be 118 deg F. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit.
 - c. The minimum pressure drop operating limit for the dilute stream across the concentrator has been determined to be 0.5 inches of water. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limits specified above at all times.

[40 CFR 63.3892 (b), and 40 CFR 63.3967 (a) and (e), and Table 1 to Subpart Mmmm (1, 5a, 5b); and OAC 3745-77-07(A)(1)]

- (3) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the elements specified in c)(3)a through c)(3)e are implemented.
 - a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.
 - b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.
 - c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.



- d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
- e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
[40 CFR 63.3893(b) and OAC 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall calculate and record the following information each quarter for emissions units K003 thru K008, K011 thru K015, and K019, combined:
 - a. the name and identification number of each adhesive employed;
 - b. the VOC content of each adhesive employed, in pounds/gallon;
 - c. the number of gallons of each adhesive employed;
 - d. the total emissions of VOC from each adhesive employed [d)(1)b x d)(1)c], in pounds;
 - e. the total emissions of VOC from all the adhesives employed [summation of d)(1)d for all adhesives), in pounds;
 - f. the total pounds of the adhesive waste sent off site;
 - g. the VOC content of the adhesive waste sent off site, in %, by weight;
 - h. the total pounds of VOC sent off site [d)(1)f x d)(1)g], in pounds; and
 - i. the total emissions of VOC for all the adhesives {[d)(1)e – d)(1)h]/2000}, in tons.
[3745-77-07(C)(1)]
- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart M, including the following sections:
 - 63.3968(a)(1) through (6) - operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)
 - 63.3968(a)(7) - definition of monitoring malfunction
 - 63.3968(b) - capture system bypass line monitoring
 - 63.3968(c) - thermal oxidizer monitor specifications
 - 63.3968(f) - gas concentrator specifications
 - 63.3930(a) - records (copies) of compliance notification reports
 - 63.3930(b) - current records of coating manufacturer /supplier HAP information
 - 63.3930(c)(1), (2), and (3) - records of calculation(s) for compliance



63.3930(d), (e), (f), and (g) - records of coating material types and volumes used, and HAP and solids content, and density (as applicable)

63.3930(j) - deviation records retention

63.3930(k)(1) - deviation records for add-on controls

63.3930(k)(2) - startup, shutdown, and malfunction records

63.3930(k)(3) - operating limit continuous compliance records

63.3930(k)(4) - Permanent Total Enclosure (PTE) criteria determination documentation

63.3930(k)(6) and (7) - control device performance test records

63.3930(k)(8) - work practice plan records

63.3931 - records retention (general)
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart M]]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a summary of the total VOC emissions for emissions units K003 thru K008, K011 thru K015, and K019, combined, for the previous calendar quarter. These reports shall be submitted by April 31, July 30, October 30 and January 31 of each year.
[OAC 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a description of the progress made during the previous calendar quarter concerning the replacement of the solvent-based adhesives with high-solids and/or water-based adhesives. The reports shall include the following information:

a. a description of the research and development work performed, including the factory trials conducted, the progress achieved and the problems encountered; and

b. data and/or logs which confirm the research and trials described in paragraph a.

These reports shall be submitted by April 31, July 30, October 30 and January 31 of each year.

[OAC 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart M, including the following sections:

63.3920(a)(2) - semi-annual reports (as in Part I - General Terms and Conditions)

63.3920(a)(3) - reporting requirements (general)

63.3920(a)(4), (7) - deviation reporting requirements (general)

63.3920(b) - performance test reports



63.3920(c) - startup, shutdown, malfunction reports
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart Mmmm]

f) Testing Requirements

- (1) Compliance with the emission limitation in b)(1) shall be determined in accordance with the following method:

Emission Limitation:

255 tons VOC/year (for emissions units K003 thru K008, K011 thru K015 and K019, combined)

Applicable compliance method:

The record keeping requirements established in c)(1) shall be used to demonstrate compliance with the annual allowable VOC emission limitation.

[OAC 3745-77-07(C)(1)]

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

[OAC 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart Mmmm, including the following sections:

63.3960, 3961, and 3963 - compliance requirements for the emission rate with add-on controls option

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart Mmmm]

g) Miscellaneous Requirements

- (1) None.



21. Emissions Unit Group - Variance - no control: K003, K004, K005, K012, K013, K015, K019,

EU ID	Operations, Property and/or Equipment Description
K003	#3 cementer (adhesives) - rubber and metal - manual spray application - with filters
K004	#4 cementer (adhesives) - rubber and metal - manual spray application - with filters
K005	#5 cementer (adhesives) - rubber and metal - manual spray application - with filters
K012	#12 cementer (adhesives) - rubber and metal - manual spray application - with filters
K013	#13 cementer (adhesives) - rubber and metal - manual spray application - with filters
K015	#15 table cementer (adhesives) - rubber and metal - manual spray application - with filters
K019	#1 and #2 pin cementers (adhesives) - rubber and metal - roll coat application

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 52.1870(c)(84) (54 FR 32637) (variance)	255 tons volatile organic compounds (VOC)/year [for emissions units K003 thru K008, K011 thru K015, and K019, combined - See b)(2)a.]
b.	40 CFR 63.3890(b)(4) [from MACT Subpart M - 40 CFR 63.3880 et seq.]	37.7 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) [See b)(2)f.]
c.	40 CFR 63.1-15 (40 CFR 63 Subpart M - Appendix)	Table 2 to Subpart M of 40 CFR Part 63 - Applicability of General Provisions to Subpart M shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-17-11(B)	None [See b)(2)b and b)(2)e.]
e.	OAC rule 3745-17-07(A)	None [See b)(2)c and b)(2)e.]
f.	OAC rule 3745-17-11(C)	See b)(2)d and c)(1).

(2) Additional Terms and Conditions

a. This emissions unit does not have to comply with the requirements of OAC rule 3745-21-09 (U) because of the variance. In lieu of the requirements of OAC rule 3745-21-09 (U), the permittee shall limit the total VOC emissions from emissions units K003 thru K008, K011 thru K015, and K019, combined, to 255 tons/year.



- b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Auglaize County.
 - c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, and c)(1) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
 - e. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
 - f. The permittee shall:
 - i. Demonstrate that the organic HAP content of each coating used in this emissions unit is less than or equal to the applicable emission limit in b)(1)b, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942, to demonstrate compliance with the applicable emission limit using this option; or
 - ii. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials, used in emissions units K003, K004, K005, K012, K013, K015, K019, and K033, combined, the organic HAP emission rate is less than or equal to the applicable emission limit in b)(1)b, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.
[40 CFR 63.3891(a) and (b)]
 - g. This emissions unit, under the compliant material option or the emission rate without add-on controls option as specified in b)(2)f, must be in compliance with the applicable emission limit in b)(1)b at all times.
[40 CFR 63.3900 (a)(1)]
- c) Operational Restrictions
- (1) The spray coating operation for this emissions unit shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices. The permittee shall follow all of these work practices:
 - a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with



any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

- b. The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- c. The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- d. The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- e. In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

Any documentation required under c)(1)a shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC 3745-77-07(A)(1) and OAC 3747-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall calculate and record the following information each quarter for emissions units K003 thru K008, K011 thru K015, and K019, combined:
 - a. the name and identification number of each adhesive employed;
 - b. the VOC content of each adhesive employed, in pounds/gallon;
 - c. the number of gallons of each adhesive employed;
 - d. the total emissions of VOC from each adhesive employed [d)(1)b x d)(1)c], in pounds;
 - e. the total emissions of VOC from all the adhesives employed [summation of d)(1)d for all adhesives), in pounds;



- f. the total pounds of the adhesive waste sent off site;
- g. the VOC content of the adhesive waste sent off site, in %, by weight;
- h. the total pounds of VOC sent off site $[d)(1)f \times d)(1)g]$, in pounds; and
- i. the total emissions of VOC for all the adhesives $\{[d)(1)e - d)(1)h]/2000\}$, in tons [OAC 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63 Subpart Mmmm, including the following sections:

63.3930(a) - records (copies) of compliance notification reports

63.3930(b) - current records of coating manufacturer /supplier HAP information

63.3930(c)(1), (2), and (3) - records of calculation(s) for compliance

63.3930(d), (e), (f), and (g) - records of coating material types and volumes used, and HAP and solids content, and density (as applicable)

63.3930(j) - deviation records retention

63.3931 - records retention (general)
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart Mmmm]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a summary of the total VOC emissions for emissions units K003 thru K008, K011 thru K015, and K019, combined, for the previous calendar quarter. These reports shall be submitted by April 31, July 30, October 30 and January 31 of each year.
[OAC 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly reports to the Ohio EPA, Northwest District Office that include a description of the progress made during the previous calendar quarter concerning the replacement of the solvent-based adhesives with high-solids and/or water-based adhesives. The reports shall include the following information:

a. a description of the research and development work performed, including the factory trials conducted, the progress achieved and the problems encountered; and

b. data and/or logs which confirm the research and trials described in paragraph a.

These reports shall be submitted by April 31, July 30, October 30 and January 31 of each year.

[OAC 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR 63 Subpart Mmmm, including the following sections:



63.3920(a)(2) - semi-annual reports (as in Part I - General Terms and Conditions)

63.3920(a)(3) - reporting requirements (general)

63.3920(a)(4), (5), and (6) - deviation reporting requirements (general)
[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart Mmmm]

f) Testing Requirements

- (1) Compliance with the emission limitation in b)(1) shall be determined in accordance with the following method:

Emission Limitation:

255 tons VOC/year (for emissions units K003 thru K008, K011 thru K015 and K019, combined)

Applicable compliance method:

The record keeping requirements established in d)(1) shall be used to demonstrate compliance with the annual allowable VOC emission limitation.

[OAC 3745-77-07(C)(1)]

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives.

[OAC 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable compliance requirements as required under 40 CFR 63 Subpart Mmmm, including the following sections:

63.3940, 3941, and 3942 - compliance requirements for the compliant material option

63.3950, 3951, and 3952 - compliance requirements for the emission rate without add-on controls option

[OAC 3745-77-07(C)(1), and 40 CFR 63 Subpart Mmmm]

g) Miscellaneous Requirements

- (1) None.