

# Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	The Cooper Tire & Rubber Company (Findlay)	
Premise Number	03-32-01-0003	
Number of Non-insignificant Emissions Units	13	
What makes this facility a Title V facility?	VOC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
n/a			

**C     Instructions for Part II:**

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

C     If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B005 B006	0.020 lb PE /mmBtu, for gas and No. 2 Oil	17-10 (B)(2)		N	N	N	N	N	N	M, R, Rp - Compliance with the limit is based on AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
B005 B006	1.6 lb SO2 /mmBtu, for No. 2 Oil	18-06 (D)		N	Y	Y	Y	N	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
B005 B006 P135	20% opacity	17-07 (A)		N	Y	Y	Y	N	N	ET - None normally required for opacity.
B006	20% opacity * when burning oil		40 CFR 60.43b (f)	N	Y	Y	Y	N	N	* one 6-minute period 27% opacity is allowed ET - None normally required for opacity.
B006	0.50 lb SO2 /mmBtu * (0.5 wt % S)		40 CFR 60.41b	Y	Y	Y	Y	N	N	* 30-day rolling average OR - 0.5 weight percent max sulfur in fuel oil ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
B006	n.g. firing 1.25 lb PE /hr 0.1 lb SO2 /hr .91 lb VOC/hr 13.8 lb CO /hr 24.7 lb NOx/hr	31-05 PTI 03-7462		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY (see also above, for NOx)
B006	oil firing 2.4 lb PE /hr 85 lb SO2 /hr .24 lb VOC/hr 6.0 lb CO /hr 33.6 lb NOx/hr	31-05 PTI 03-7462		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY (see also above, for NOx)

B006	0.20 lb NOx /mmBtu *		40 CFR 60.44b (a)(1) (ii)	N	Y	Y	Y	N	N	* 30-day rolling average ET - Engineering Guide 16 - actual emissions are a bit >25 TPY NSPS requires certified PEMS, but does not require separate Method 7 test Determination: no separate reference method testing will be required.
K002	10 gm VOC /tire cemented		40 CFR 60.652 (a)(3)	N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - The recordkeeping and reporting requirements are sufficient to demonstrate compliance (mass balance) without emissions testing.
K002	8250 lb VOC /month, 49.6 ton VOC /yr	31-05 PTI 03-7035		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - The recordkeeping and reporting requirements are sufficient to demonstrate compliance (mass balance) without emissions testing.
P005	3 lb OC /hr 15 lb OC /day	21-07 (G)(1)		N	N	N	N	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P005	1.3 lb/hr formaldehyde 6.3 lb/day	31-05 PTI 03-5312		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P005	1.7 lb/hr styrene 8.7 lb/day	31-05 PTI 03-5312		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P135	1.2 lb PE /hr	31-05 PTI 03-7432		Y	Y	Y	Y	N	N	OR - Pressure drop operational range across the baghouse required. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P147	31.4 lb VOC /day, 2.9 lb HAP /day	31-05 PTI 03-10013		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P149	22.8 lb VOC /day, 4.17 ton VOC /yr	31-05 PTI 03-9988		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P149	7.8 lb HAP /day, 1.42 ton HAP /yr	31-05 PTI 03-9988		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using manufacturer information; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY

P150	4.3 lb VOC /day, 0.78 ton VOC /yr	31-05 PTI 03- 9988		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using manufacturer information; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P150	7.8 lb HAP /day, 1.42 ton HAP /yr	31-05 PTI 03- 9988		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using manufacturer information; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R010	0.16 lb VOC /hr	31-05 PTI 03- 5312		N	N	N	N	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R010	0.068 lb/hr formaldehyde	31-05 PTI 03- 5312		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R010	0.092 lb/hr styrene	31-05 PTI 03- 5312		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R012	2.46 lb VOC /hr, 5.16 ton VOC /yr	31-05 PTI 03- 11017		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using manufacturer information; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R012	6.0 lb OC per gallon ink 6.8 lb OC per gallon thinner	31-05 PTI 03- 11017		N	N	Y	Y	N	N	M - No monitoring is necessary to show compliance. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R012	see OR in comments	21-07 (G)		Y	Y	Y	Y	N	N	OR - cannot use photochemically-reactive materials. ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.

EU = emissions unit id

OR = operational restriction  
M = monitoring requirements  
R = recordkeeping requirements  
Rp = reporting requirements  
ET = emission testing requirements (not including compliance method terms)  
Misc = miscellaneous requirements

**C Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.