



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

03/20/02

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

03-32-01-0003
The Cooper Tire Company - Findlay
Tabetha L. Daum
701 Lima Ave.
P.O. Box 550
Findlay, OH 45840-0550

Dear Tabetha L. Daum:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 08/31/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

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

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 03/20/02	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
-----------------------------	--	---

This document constitutes issuance of a Title V permit for Facility ID: 03-32-01-0003 to:
The Cooper Tire Company - Findlay
 701 Lima Ave.
 Findlay, OH 45840-0550

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

B005 (B005) 118 MMBTU/HR Natural Gas/No. 2 Fuel Oil Fired Boiler	P135 (P135) Banbury Mixer #1 (includes mixer charge door/drop door)	R010 (R010) Z Calender Fabric Dip Tank
B006 (B006) 168.1 MMBTU/HR Natural Gas/No.2 Fuel Oil Fired Boiler	P147 (P147) Twin Two Calender Line #1	R012 (R012) Tread Marking
K002 (K002) 10"x 6" Cold Feed Pin Barrel Line #6 Tread End Cement Station (Manual)	P149 (P149) WSW Component Line #10	Z002 (Z002) Tire Inspection and Repair Station #1
P005 (P005) Z Calender Oven (8 MMBTU/HR Gas Fired Oven)	P150 (P150) 10"x 6" Cold Feed Pin Barrel Tread Line #6 Extruder	Z003 (Z003) Tire Inspection and Repair Station #2
P007 (P007) Hot Feed Tread Line #1 Tread End Cement Station (Manual)		

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(*Authority for term: OAC rule 3745-77-07(A)(3)(b)(i)*)
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(*Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii)*)
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(*Authority for term: OAC rule 3745-77-07(A)(3)(c)*)
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, 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 taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
(*Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii)*)

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. **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, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

3. **Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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

4. **Title IV Provisions**

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

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

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

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

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. Reopening for Cause

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

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

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

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

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

15. Emergencies

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

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

16. Off-Permit Changes

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

18. Insignificant Activities

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

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

19. Permit to Install Requirement

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

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

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution

control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

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

Green Tire Painter #10, Ohio EPA emissions unit K003;
Green Tire Painter #11, Ohio EPA emissions unit K004;
Green Tire Painter #7, Ohio EPA emissions unit K005;
Green Tire Painter #12, Ohio EPA emissions unit K006;
Cold Cleaner Vapor Degreaser #1, Ohio EPA emissions unit L001;
Cold Cleaner Vapor Degreaser #2, Ohio EPA emissions unit L002;
Cold Cleaner Vapor Degreaser #3, Ohio EPA emissions unit L003;
Cold Cleaner Vapor Degreaser #4, Ohio EPA emissions unit L004;
Cold Cleaner Vapor Degreaser #5, Ohio EPA emissions unit L005;
Cold Cleaner Vapor Degreaser #6, Ohio EPA emissions unit L006;
Cold Cleaner Vapor Degreaser #7, Ohio EPA emissions unit L007;
Cold Cleaner Vapor Degreaser #8, Ohio EPA emissions unit L008;
Cold Cleaner Vapor Degreaser #9, Ohio EPA emissions unit L009;
Cold Cleaner Vapor Degreaser #10, Ohio EPA emissions unit L010;
Cold Cleaner Vapor Degreaser #11, Ohio EPA emissions unit L011;
Cold Cleaner Vapor Degreaser #12, Ohio EPA emissions unit L012;
Cold Cleaner Vapor Degreaser #13, Ohio EPA emissions unit L013;
Cold Cleaner Vapor Degreaser #14, Ohio EPA emissions unit L014;
Cold Cleaner Vapor Degreaser #15, Ohio EPA emissions unit L015;
Tire Curing Presses (A01-A19), Ohio EPA emissions unit P014;
Tire Curing Presses (B01-B09 & B11), Ohio EPA emissions unit P015;
Tire Curing Presses (D01-D11), Ohio EPA emissions unit P017;
Tire Building Stations, Ohio EPA emissions unit P024;
White Sidewall Buffer #4, Ohio EPA emissions unit P025;
White Sidewall Buffer #3, Ohio EPA emissions unit P026;

White Sidewall Buffer #2, Ohio EPA emissions unit P027;
White Sidewall Buffer #1, Ohio EPA emissions unit P028;
Tire Uniformity Optimizer #1, Ohio EPA emissions unit P118;
Tire Uniformity Optimizer #2, Ohio EPA emissions unit P119;
Tire Uniformity Optimizer #3, Ohio EPA emissions unit P120;
Tire Uniformity Optimizer #4, Ohio EPA emissions unit P121;
White Sidewall Buffer #5, Ohio EPA emissions unit P122;
Manual White Sidewall Buffer #6, Ohio EPA emissions unit P123;
Tire Uniformity Optimizer #5, Ohio EPA emissions unit P124;
Tire Uniformity Optimizer #6, Ohio EPA emissions unit P126;
Pellet Cooler or Rotary Cooler, Ohio EPA emissions unit P127;
Tire Uniformity Optimizer #8, Ohio EPA emissions unit P128;
Tire Uniformity Optimizer #7, Ohio EPA emissions unit P130;
Tire Uniformity Optimizer #9, Ohio EPA emissions unit P131;
Tire Uniformity Optimizer #10, Ohio EPA emissions unit P132;
Tire Uniformity Optimizer #11, Ohio EPA emissions unit P133;
Banbury Mixer #4 and Drop Mill, Ohio EPA emissions unit P136;
Banbury Mixer #3 and Drop Mill, Ohio EPA emissions unit P137;
Cold Cleaner #2, Ohio EPA emissions unit P138;
Banbury Mixer #5 and Drop Mill, Ohio EPA emissions unit P140;
Tire Uniformity Optimizer #12, Ohio EPA emissions unit P143;
Tire Uniformity Optimizer #13, Ohio EPA emissions unit P145;
Mold Cleaner, Ohio EPA emissions unit P146;
Black Sidewall Component Line #9, Ohio EPA emissions unit P148;
Tire Curing Press N06, Ohio EPA emissions unit P801;

B. State Only Enforceable Section (continued)

Tire Curing Press N07, Ohio EPA emissions unit P802;
Tire Curing Press N08, Ohio EPA emissions unit P803;
Tire Curing Press N09, Ohio EPA emissions unit P804;
Tire Curing Press N10, Ohio EPA emissions unit P805;
Tire Curing Press P06, Ohio EPA emissions unit P806;
Tire Curing Press P07, Ohio EPA emissions unit P807;
Tire Curing Press P08, Ohio EPA emissions unit P808;
Tire Curing Press P09, Ohio EPA emissions unit P809;
Tire Curing Press P10, Ohio EPA emissions unit P810;
Tire Curing Press A00, Ohio EPA emissions unit P811;
Tire Curing Press B12, Ohio EPA emissions unit P812;
Tire Curing Press B13, Ohio EPA emissions unit P813;
Tire Curing Press B14, Ohio EPA emissions unit P814;
Tire Curing Press C00, Ohio EPA emissions unit P815;
Tire Curing Press D12, Ohio EPA emissions unit P816;
Tire Curing Press D13, Ohio EPA emissions unit P817;
Tire Curing Press D14, Ohio EPA emissions unit P818;
Tire Curing Press G08, Ohio EPA emissions unit P819;
Tire Curing Press G09, Ohio EPA emissions unit P820;
Tire Curing Press G10, Ohio EPA emissions unit P821;
Tire Curing Press G11, Ohio EPA emissions unit P822;
Tire Curing Press H01, Ohio EPA emissions unit P823;
Tire Curing Press H02, Ohio EPA emissions unit P824;
Tire Curing Press H03, Ohio EPA emissions unit P825;
Tire Curing Press H04, Ohio EPA emissions unit P826;

Tire Curing Press H05, Ohio EPA emissions unit P827;
Tire Curing Press H09, Ohio EPA emissions unit P828;
Tire Curing Press H10, Ohio EPA emissions unit P829;
Tire Curing Press H11, Ohio EPA emissions unit P830;
Tire Curing Press H08, Ohio EPA emissions unit P831;
Tire Curing Press J01, Ohio EPA emissions unit P832;
Tire Curing Press J02, Ohio EPA emissions unit P833;
Tire Curing Press J03, Ohio EPA emissions unit P834;
Tire Curing Press J04, Ohio EPA emissions unit P835;
Tire Curing Press J05, Ohio EPA emissions unit P836;
Tire Curing Press J06, Ohio EPA emissions unit P837;
Tire Curing Press J07, Ohio EPA emissions unit P838;
Tire Curing Press J08, Ohio EPA emissions unit P839;
Tire Curing Press J09, Ohio EPA emissions unit P840;
Tire Curing Press K07, Ohio EPA emissions unit P841;
Tire Curing Press K08, Ohio EPA emissions unit P842;
Tire Curing Press K09, Ohio EPA emissions unit P843;
Tire Curing Press K10, Ohio EPA emissions unit P844;
Tire Curing Press K11, Ohio EPA emissions unit P845;
Tire Curing Press K12, Ohio EPA emissions unit P846;
Tire Curing Press L10, Ohio EPA emissions unit P847;
Tire Curing Press L11, Ohio EPA emissions unit P848;
Tire Curing Press L12, Ohio EPA emissions unit P849;
Tire Curing Press L13, Ohio EPA emissions unit P850;
Tire Curing Press L14, Ohio EPA emissions unit P851;

B. State Only Enforceable Section (continued)

Tire Curing Press L15, Ohio EPA emissions unit P852;
Tire Curing Press M11, Ohio EPA emissions unit P853;
Tire Curing Press M12, Ohio EPA emissions unit P854;
Tire Curing Press M13, Ohio EPA emissions unit P855;
Tire Curing Press M14, Ohio EPA emissions unit P856;
Tire Curing Press M15, Ohio EPA emissions unit P857;
Tire Curing Press N01, Ohio EPA emissions unit P858;
Tire Curing Press N02, Ohio EPA emissions unit P859;
Tire Curing Press N03, Ohio EPA emissions unit P860;
Tire Curing Press N04, Ohio EPA emissions unit P861;
Tire Curing Press N05, Ohio EPA emissions unit P862;
Tire Curing Press P01, Ohio EPA emissions unit P863;
Tire Curing Press P02, Ohio EPA emissions unit P864;
Tire Curing Press P03, Ohio EPA emissions unit P865;
Tire Curing Press P04, Ohio EPA emissions unit P866;
Tire Curing Press P05, Ohio EPA emissions unit P867;
Tire Curing Press R01 (Not Installed), Ohio EPA emissions unit P868;
Tire Curing Press R02 (Not Installed), Ohio EPA emissions unit P869;
Tire Curing Press M09 (Not Installed), Ohio EPA emissions unit P871;
Tire Curing Press M10 (Not Installed), Ohio EPA emissions unit P872;
Tire Curing Press R03 (Not Installed), Ohio EPA emissions unit P873;
Green Tire Painter #8, Ohio EPA emissions unit R008;
R & D Spraybooth, Ohio EPA emissions unit R009;
Green Tire Painter #9, Ohio EPA emissions unit R011;
Tank #4 - Tank Farm (12105), Ohio EPA emissions unit T003;
Tank #3 - Tank Farm (12105), Ohio EPA emissions unit T004;
Tank #2 - Tank Farm (2224), Ohio EPA emissions unit T005;
Tank #1 - Tank Farm (2224), Ohio EPA emissions unit T006;
Process Oil Tank #6- In Basement, Ohio EPA emissions unit T007;
Tank #6 - Tank Farm (16003), Ohio EPA emissions unit T008;

Process Oil Tank #7- In Bsmnt (2224), Ohio EPA emissions unit T009;
Process Oil Tank #5- In Bsmnt (2223), Ohio EPA emissions unit T010;
Process Oil Tank #8- In Bsmnt (13058), Ohio EPA emissions unit T011;
Tank #5 - Tank Farm (16003), Ohio EPA emissions unit T012;
Latex Storage Tank #1- Bldg 28 (1110), Ohio EPA emissions unit T013;
Latex Storage Tank #2- Bldg 28 (1110), Ohio EPA emissions unit T014;
Bead ID Paint Operations, Ohio EPA emissions unit Z001;
Tire Building Machine, Ohio EPA emissions unit Z004;
Tire Building Machine, Ohio EPA emissions unit Z005;
Tire Building Machine, Ohio EPA emissions unit Z006;
Tire Building Machine, Ohio EPA emissions unit Z007;
Tire Building Machine, Ohio EPA emissions unit Z008;
Tire Building Machine, Ohio EPA emissions unit Z009;
Tire Building Machine, Ohio EPA emissions unit Z010;
Tire Building Machine, Ohio EPA emissions unit Z011;
Tire Building Machine, Ohio EPA emissions unit Z012;
Tire Building Machine, Ohio EPA emissions unit Z013;
Tire Building Machine, Ohio EPA emissions unit Z014;
Tire Building Machine, Ohio EPA emissions unit Z015;
Tire Building Machine, Ohio EPA emissions unit Z016;
Tire Building Machine, Ohio EPA emissions unit Z017;
Tire Building Machine, Ohio EPA emissions unit Z018;
Tire Building Machine, Ohio EPA emissions unit Z019;
Tire Building Machine, Ohio EPA emissions unit Z020;
Tire Building Machine, Ohio EPA emissions unit Z021;

B. State Only Enforceable Section (continued)

Tire Building Machine, Ohio EPA emissions unit Z022;
Tire Building Machine, Ohio EPA emissions unit Z023;
Tire Building Machine, Ohio EPA emissions unit Z024;
Tire Building Machine, Ohio EPA emissions unit Z025;
Tire Building Machine, Ohio EPA emissions unit Z026;
Tire Building Machine, Ohio EPA emissions unit Z027;
Tire Building Machine, Ohio EPA emissions unit Z028;
Tire Building Machine, Ohio EPA emissions unit Z029;
Tire Building Machine, Ohio EPA emissions unit Z030;
Tire Building Machine, Ohio EPA emissions unit Z031;
Tire Building Machine, Ohio EPA emissions unit Z032;
Tire Building Machine, Ohio EPA emissions unit Z033;
Tire Building Machine, Ohio EPA emissions unit Z034;
Tire Building Machine, Ohio EPA emissions unit Z035;
Tire Building Machine, Ohio EPA emissions unit Z036;
Tire Building Machine, Ohio EPA emissions unit Z037;
Tire Building Machine, Ohio EPA emissions unit Z038;
Tire Building Machine, Ohio EPA emissions unit Z039;
Tire Building Machine, Ohio EPA emissions unit Z040;
Tire Building Machine, Ohio EPA emissions unit Z041;
Tire Building Machine, Ohio EPA emissions unit Z042;
Tire Building Machine, Ohio EPA emissions unit Z043;
Tire Building Machine, Ohio EPA emissions unit Z044;
Tire Building Machine, Ohio EPA emissions unit Z045;
Tire Building Machine, Ohio EPA emissions unit Z046;

Tire Building Machine, Ohio EPA emissions unit Z047;
Tire Building Machine, Ohio EPA emissions unit Z048;
Tire Building Machine, Ohio EPA emissions unit Z049;
Tire Building Machine, Ohio EPA emissions unit Z050;
Tire Building Machine, Ohio EPA emissions unit Z051;
Tire Building Machine, Ohio EPA emissions unit Z052;
Tire Building Machine, Ohio EPA emissions unit Z053;
Tire Building Machine, Ohio EPA emissions unit Z054;
Tire Building Machine, Ohio EPA emissions unit Z055;
Tire Building Machine, Ohio EPA emissions unit Z056;
Tire Building Machine, Ohio EPA emissions unit Z057;
Tire Building Machine, Ohio EPA emissions unit Z058;
Tire Building Machine, Ohio EPA emissions unit Z059;
Tire Building Machine, Ohio EPA emissions unit Z060;
Tire Building Machine, Ohio EPA emissions unit Z061;
Tire Building Machine, Ohio EPA emissions unit Z062;
Tire Building Machine, Ohio EPA emissions unit Z063;
Tire Building Machine, Ohio EPA emissions unit Z064;
Tire Building Machine, Ohio EPA emissions unit Z065;
Tire Building Machine, Ohio EPA emissions unit Z066;
Tire Building Machine, Ohio EPA emissions unit Z067;
Tire Building Machine, Ohio EPA emissions unit Z068;
Tire Building Machine, Ohio EPA emissions unit Z069;
Tire Building Machine, Ohio EPA emissions unit Z070;
Tire Building Machine, Ohio EPA emissions unit Z071;

B. State Only Enforceable Section (continued)

Tire Building Machine, Ohio EPA emissions unit Z072;
Tire Building Machine, Ohio EPA emissions unit Z073;
Tire Building Machine, Ohio EPA emissions unit Z074;
Tire Building Machine, Ohio EPA emissions unit Z075;
Tire Building Machine, Ohio EPA emissions unit Z076;
Tire Building Machine, Ohio EPA emissions unit Z077;
Tire Building Machine, Ohio EPA emissions unit Z078;
Tire Building Machine, Ohio EPA emissions unit Z079;
Tire Building Machine, Ohio EPA emissions unit Z080;
Tire Building Machine, Ohio EPA emissions unit Z081; and
Tire Building Machine, Ohio EPA emissions unit Z082

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B005 (B005)

Activity Description: 118 MMBTU/HR Natural Gas/No. 2 Fuel Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
boiler - 118 mmBtu/hr - natural gas & no. 2 fuel oil (standby boiler)	OAC rule 3745-17-10(B)(1) and (B)(2)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-18-06(D)	1.6 lbs SO ₂ /mmBtu of actual heat input (for oil firing)
	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.
	OAC rule 3745-31-05 (PTI 03-927)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-10(B), 3745-18-06(D), 3745-17-07(A), 3745-23-06(B), and 3745-21-08(B).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-927.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or no. 2 fuel oil in this emissions unit.
2. The oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I. above.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or no. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

2. For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and 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, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
3. 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, D4294, D6010), or equivalent methods as approved by the Director.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or no. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III. above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

V. Testing Requirements

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

- 1.a Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method-

When firing natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-2 (revised 7/98)] of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

When firing no. 2 oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the emission factor for no. 2 oil [from AP-42, Section 1.3, Table 1.3-1 (revised 9/98)] of 2.0 lbs PE (filterable)/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE standard above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation:
1.6 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission standard may be demonstrated by documenting that the sulfur content of each shipment of oil received meets the limitation.

When firing natural gas, compliance with the allowable SO₂ emission standard will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the allowable SO₂ emission standard in accordance with the methods specified in OAC rule 3745-18-04(A).

V. Testing Requirements (continued)

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B006 (B006)

Activity Description: 168.1 MMBTU/HR Natural Gas/No.2 Fuel Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
boiler - 168 mmBtu/hr - natural gas & no. 2 fuel oil	40 CFR, Part 60, Subpart Db	0.20 lb nitrogen oxides (NOx)/mmBtu of actual heat input, as a 30-day rolling average (40 CFR 60.44b(a)(1)(ii))
		Visible PE shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity (when firing oil).
		See Section A.II.1.
		See A.I.2.a.
	OAC rule 3745-18-06(D)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-10(B)(1)	When firing only natural gas, visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-07(A)	When firing no. 2 fuel oil, see A.I.2.b.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05 (PTI 03-7462)	when firing only natural gas: 1.25 lbs PE/hr 0.1 lb SO ₂ /hr 0.91 lb volatile organic compounds (VOC)/hr 13.8 lbs carbon monoxide (CO)/hr 24.7 lbs NO _x /hr
		when firing no. 2 fuel oil: 2.4 lbs PE/hr 85.1 lbs SO ₂ /hr 0.24 lb VOC/hr 6.0 lbs CO/hr 33.6 lbs NO _x /hr
	OAC rules 3745-21-08(B) and 3745-23-06(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B), 3745-17-07(A), 3745-23-06(B), 3745-21-08(B), and 40 CFR, Part 60, Subpart Db. See A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 60.41b (40 CFR, Part 60, Subpart Db).
- 2.b** The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to 40 CFR 60.43b (40 CFR, Part 60, Subpart Db).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-7462.

II. Operational Restrictions

- 1.** The oil burned in this emissions unit shall be only a very low sulfur oil that contains no more than 0.5 percent sulfur, by weight.
(40 CFR 60.41b)
[40 CFR 60.42b(d)]
- 2.** The opacity limitation established in Section A.I.1 pursuant to 40 CR, Part 60, Subpart Db, shall apply at all times, except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(g)].
- 3.** The NO_x emission limitation specified in Section of A.I.1 shall apply at all times [40 CFR 60.44b(h)].
- 4.** The permittee shall employ no more than 7.6 million gallons of no. 2 fuel oil per rolling, 12-month period.

III. Monitoring and/or Record Keeping 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 and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. 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, D4294, D6010), or equivalent methods as approved by the Director.

For each shipment of oil, the permittee shall also obtain a fuel supplier certification that includes the following information [40 CFR 60.49b(r)]:

- a. the name of the oil supplier; and
 - b. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR, Part 60, Section 60.41b.
2. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

3. The permittee shall monitor the steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 40 CFR, 60.49b(c). The plan shall:
 - a. Identify the specific operating conditions to be monitored and the relationship between these operating conditions and nitrogen oxides emission rates (i.e., lbs/mmBtu of actual heat input). The steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas oxygen level).
 - b. Include the data and information that the permittee used to identify the relationship between nitrogen oxides emission rates and these operating conditions.
 - c. Identify how these operating conditions, including the steam generating unit load, will be monitored on an hourly basis by the permittee during the period of operation of the emissions unit; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the permittee under Section A.III.4.

The permittee shall maintain records of the predicted nitrogen oxides emission rates and the monitored operating conditions, including steam generating unit load, identified in the plan [40 CFR 60.49b(c)].

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

4. The permittee shall maintain records of the following information for each steam generating unit operating day (i.e., any calendar day that includes operation of this emissions unit):
 - a. Calendar date.
 - b. The average hourly nitrogen oxides emission rates (expressed as NO₂) (ng/J or lb/mmBtu of actual heat input) measured or predicted.
 - c. The 30-day average nitrogen oxides emission rates (ng/J or lb/mmBtu of actual heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxides emission rates for the preceding 30 steam generating unit operating days.
 - d. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides allowable emission limitation, with the reasons for such excess emissions as well as a description of corrective actions taken.
 - e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
 - f. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
 - g. Identification of the 'F' factor used for calculations, method of determination, and type of fuel combusted.
 - h. Identification of the times when the pollutant concentration exceeded the full span of the continuous monitoring system, if applicable.
 - i. Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.
 - j. Results of daily Sensor Validation System tests of the PEMS and quarterly accuracy assessments as required under the plan pursuant to A.III.4 [40 CFR 60.49b(g)]

[During periods when performance tests are not requested, nitrogen oxides emissions data collected pursuant to A.III.5 are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the nitrogen oxides emission standards.
(40 CFR 60.46b(e)(4))]
5. The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the quantity of no. 2 fuel oil burned, in gallons; and
 - b. the rolling, 12-month summation of the quantity of no. 2 fuel oil burned, in gallons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of each oil shipment record that shows a deviation of the allowable sulfur dioxide limitation of 0.50 lb SO₂/mmBtu of actual heat input or the restriction of the 0.5 percent sulfur content. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter [40 CFR Parts 60.7 and 60.13(h)].

3. The permittee shall submit quarterly reports containing the information recorded under A.III.4 [40 CFR 60.49b(i)].

These reports shall be submitted by January 30, April 30, July 30, and October 30 of each year, and shall cover the previous calendar quarter [40 CFR 60.49b(s)].

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel oil usage restriction of 7.6 million gallons. These quarterly reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Sulfur Content Limitation:
0.50%, by weight, sulfur in oil

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section A.III.1 of the terms and conditions of this permit.

- 1.b Emission Limitation:
0.20 lb NO_x/mmBtu of actual heat input, as a 30-day rolling average

Applicable Compliance Method:

For the use of natural gas, compliance may be determined based upon the AP-42, Table 1.4-1 (revised 2/98) emission factor of 0.14 lb NO_x/mmBtu (for low-NO_x burners).

For the use of no. 2 fuel oil, compliance may be determined based upon the AP-42, Table 1.3-1 (revised 9/98) emission factor of 0.07 lb NO_x/mmBtu (for low-NO_x burners).

If required, the permittee shall demonstrate compliance with the allowable NO_x emission standard above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7, or in accordance with 40 CFR 60.46b(e)(4).

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity (when firing oil).
- Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with 40 CFR, Part 60, Appendix A, Method 9.
- 1.d** Emission Limitation:
0.020 lb PE/mmBtu of actual heat input
- Applicable Compliance Method:
For the use of natural gas, compliance may be determined based upon the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 0.002 lb PE/mmBtu.
- For the use of no. 2 fuel oil, compliance may be determined based upon the AP-42, Table 1.3-1 (revised 9/98) emission factor for no. 2 fuel oil of 0.014 lb PE/ mmBtu.
- If required, the permittee shall demonstrate compliance with the allowable PE standard above in accordance with the methods specified in OAC rule 3745-17-03(B)(9).
- 1.e** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
- Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).
- 1.f** Emission Limitation:
0.1 lb SO₂/hr (when firing only natural gas)
- Applicable Compliance Method:
For the use of natural gas, compliance with the hourly allowable SO₂ emission limitation may be determined by multiplying the AP-42, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb SO₂/mm cu. ft by the maximum hourly fuel burning capacity (mm cu. ft/hour) of the emissions unit.
- If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and 6.
- 1.g** Emission Limitations:
24.7 lbs NO_x/hr (for natural gas only)
33.6 lbs NO_x/hr (for oil)
- Applicable Compliance Method:
For the use of natural gas only, compliance with the hourly allowable NO_x emission limitation may be determined by multiplying the AP-42, Table 1.4-1 (revised 2/98) emission factor of 100 lbs NO_x/mm cu. ft by the maximum hourly fuel burning capacity (mm cu. ft/hour) of the emissions unit.
- For the use of no. 2 fuel, compliance with the hourly allowable NO_x emission limitation may be determined by multiplying the AP-42, Table 1.3-1 (revised 9/98) emission factor of 20 lbs NO_x/1000 gallons of fuel oil by the maximum hourly fuel burning capacity (gallons/hour) of the emissions unit.
- If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4, and 7.

V. Testing Requirements (continued)

- 1.h** Emission Limitations:
1.25 lbs PE/hr (for natural gas only)
2.4 lbs PE/hr (for oil)

Applicable Compliance Method:

For the use of natural gas only, compliance with the hourly allowable PE limitation may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 1.9 lbs PE/mm cu. ft.

For the use of no. 2 fuel oil, compliance with the hourly allowable PE limitation may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hour) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for no. 2 fuel oil of 2 lbs PE/1000 gallons.

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

- 1.i** Emission Limitations:
13.8 lbs CO/hr (for natural gas only)
6.0 lbs CO/hr (for oil)

Applicable Compliance Method:

For the use of natural gas only, compliance with the hourly allowable CO emission limitation may be determined by multiplying the AP-42, Table 1.4-1 (revised 2/98) emission factor of 84 lbs CO/mm cu. ft by the maximum hourly fuel burning capacity (mm cu. ft/hour) of the emissions unit.

For the use of no. 2 fuel oil, compliance with the hourly allowable CO emission limitation may be determined by multiplying the AP-42, Table 1.3-1 (revised 9/98) emission factor of 5 lbs CO/1000 gallons of fuel oil by the maximum hourly fuel burning capacity (gallons/hour) of the emissions unit.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

- 1.j** Emission Limitations:
0.91 lb VOC/hr (for natural gas only)
0.24 lb VOC/hr (for oil)

Applicable Compliance Method:

For the use of natural gas only, compliance with the hourly allowable VOC emission limitation may be determined by multiplying the AP-42, Table 1.4-2 (revised 2/98) emission factor of 5.5 lbs VOC/mm cu. ft by the maximum hourly fuel burning capacity (mm cu. ft/hour) of the emissions unit.

For the use of no. 2 fuel oil, compliance with the hourly allowable VOC emission limitation may be determined by multiplying the AP-42, Table 1.3-3 (revised 9/98) emission factor of 0.2 lb VOC/1000 gallons of fuel oil by the maximum hourly fuel burning capacity (gallons/hour) of the emissions unit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 25.

- 1.k** Emission Limitation:
85.1 lbs SO₂/hr (for oil)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and 6.

- 1.l** Usage Restriction:
7 million gallons of fuel oil/rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section A.III.5 of the terms and conditions of this permit.

VI. Miscellaneous Requirements

1. Administratively modified PTI # 03-7462, dated October 15, 2000, was issued with an incorrect maximum allowable emission limitation for SO₂ (when firing oil). As a result, the permittee cannot demonstrate compliance with the current PTI limitation of 85.1 lbs SO₂/hr. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K002 (K002)

Activity Description: 10"x 6" Cold Feed Pin Barrel Line #6 Tread End Cement Station (Manual)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Manual Tread End Cementer #4	40 CFR 60.542(a)(3) (40 CFR, Part 60, Subpart BBB)	10 grams of volatile organic compounds (VOC) per tire cemented (monthly average basis)
	OAC rule 3745-31-05(D) (PTI #03-13532)	17.10 lbs of VOC/hour
		20.81 tons of VOC/rolling 12-month period (See A.I.2.a.)
	OAC rule 3745-21-09(X)	The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart BBB. exempt, pursuant to OAC rule 3745-21-09(X)(2)(d) (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable emission limitation of 20.81 tons of VOC per rolling, 12-month period based on gallon usage and VOC content restrictions (see A.II.1 and A.II.2) for purposes of avoiding a PSD significant net emissions increase under 40 CFR 52.21(b)(23).
- 2.b Any operation subject to the federal "Standards of Performance for New Stationary Sources, 40 CFR, Part 60, Subpart BBB" is exempt from the requirements of OAC rule 3745-21-09(X).
- 2.c The VOC emission limitation of 17.10 lb/hr is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting are required to demonstrate compliance with this limitation.

II. Operational Restrictions

1. The VOC content of the tread end cement shall not exceed 5.70 pounds per gallon, as applied.
2. The maximum annual tread end cement usage for this emissions unit shall not exceed 7,300 gallons based on a rolling, 12-month summation of the monthly cement usage rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each tread end cement employed;
 - b. the VOC content of each tread end cement, in pounds per gallon, as applied;
 - c. the number of gallons of each tread end cement employed;
 - d. the VOC emission rate for each tread end cement employed, in pounds (b x c);
 - e. the total VOC emission rate for all the tread end cements employed (summation of 'd' for all tread end cements), in pounds;
 - f. the number of tires cemented;
 - g. the VOC emitted per tire cemented, in grams per tire [(e/ f)(453.5924 grams / 1 pound)];
 - h. the total number of gallons of all the tread end cement employed (summation of c for all tread end cement); and
 - i. the rolling, 12-month summation of the monthly tread end cement usage rates, in gallons, and the rolling, 12-month summation of the monthly VOC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - i. all exceedances of the VOC emission limitation of 10 grams/tire cemented;
 - ii. all exceedances of the tread end cement usage restriction of 7,300 gallons per rolling, 12-month period;
 - iii. all exceedances of the VOC content restriction of 5.70 lbs/gallon; and
 - iv. all exceedances of the rolling, 12-month VOC emission limitation of 20.81 tons.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that summarize the annual VOC emissions from this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
17.10 lbs of VOC per hour

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established by multiplying the maximum hourly cement usage rate of 3 gallons per hour by the VOC content of 5.70 pounds per gallon, as applied.

If required, compliance with the hourly allowable VOC emission limitation shall be determined in accordance with the 40 CFR, Part 60, Appendix A, Methods 18, 25, or 25A, as appropriate.

V. Testing Requirements (continued)

1.b Emission Limitation:
21.80 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.c Emission Limitation:
10 grams of VOC per tire cemented (monthly average basis)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section A.III.1 of the terms and conditions of this permit.

2. 40 CFR 60, Appendix A, Method 24 or formulation data shall be used for the determination of the VOC content of cements. In the event of dispute, Method 24 shall be the reference method. For Method 24, the cement sample shall be a 1-liter sample collected in a 1-liter container at a point where the sample will be representative of the material, as applied.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P005 (P005)

Activity Description: Z Calender Oven (8 MMBTU/HR Gas Fired Oven)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
'Z calender' oven - 8 mmBtu/hr - natural gas - (associated with emissions unit R010)	OAC rule 3745-21-07(G)(1)	3 lbs organic compounds (OC)/hr and 15 lbs OC/day
	OAC rule 3745-31-05(A) PTI # 03-5312	1.3 lbs formaldehyde/hr, 6.3 lbs/day 1.7 lbs styrene/hr, 8.7 lbs/day The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1).

2. Additional Terms and Conditions

- For purposes of calculating the organic compound emission rates for this emissions unit and the associated dip line (emissions unit R010), the permittee shall utilize a value of 20 percent as the maximum percentage of the organic compounds (including formaldehyde and styrene) employed in the dip line that are emitted uncontrolled from the dip line. The remaining 80 percent of the organic compounds employed in the dip line shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of organic compound emissions between this emissions unit and the associated dip line is based upon calculations provided by the permittee that incorporated information from the dip line material supplier. The "split" of OC emissions between this emissions unit and the associated dip line shall be revised in accordance with the results of any future testing to determine the oven/dip line split (weight %).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the oven:
 - a. The total potential (prior to applying the dip line /oven "split") uncontrolled daily OC* emission rate for all the materials employed in the dip line associated with this emissions unit (R010), multiplied by the maximum percentage of the emissions associated with this emissions unit as defined in condition A.I.2.a of this permit, in pounds per day.
 - b. The total number of hours this emissions unit was in operation. (This number should be the same as the number of hours the associated dip line was in operation.)
 - c. The average hourly OC* emission rate, i.e., (a)/(b), in pounds per hour (average).

* No monitoring, record keeping and reporting requirements of the formaldehyde and styrene emissions are included at this time since there are no emission factors available to calculate these emissions. The permittee shall supply the Ohio EPA with the appropriate emission factors for formaldehyde and styrene when the PTI modification application, as required in Section VI.1, is submitted (see emissions unit R010, Section A.III.1).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly OC* emissions exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day.
 - b. An identification of each day during which the OC* emissions exceeded 15 pounds per day, and the actual emissions for OC, formaldehyde, and/or styrene emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

* See note in Section A.III.1. above.

V. Testing Requirements

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

Emission Limitations:

3 lbs OC/hr and 15 lbs OC/day

1.3 lbs formaldehyde/hr*, 6.3 lbs/day*

1.7 lbs styrene/hr*, 8.7 lbs/day*

Applicable Compliance Method:

If required, compliance with the hourly allowable emission limitations above shall be demonstrated pursuant to Method 18 (or any other USEPA-approved Method) of 40 CFR, Part 60, Appendix A.

The permittee also shall demonstrate compliance with the hourly allowable OC emission limitation above through the record keeping requirements established in Section A.III.1 of this permit.

* No emission factors are available at this time that would enable the permittee to calculate the emission rates for formaldehyde and styrene (see Section A.III.1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials added to the dip tank.

Facility Name: **The Cooper Tire & Rubber Company**

Facility ID: **03-32-01-0003**

Emissions Unit: **P005 (P005)**

VI. Miscellaneous Requirements

1. The permittee incorrectly represented the maximum emission rates for OC, formaldehyde, and styrene in its application for PTI # 03-5312, dated July 11, 1990. As a result, the permittee cannot demonstrate compliance with the current PTI limitations for OC, formaldehyde, and styrene. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P007 (P007)

Activity Description: Hot Feed Tread Line #1 Tread End Cement Station (Manual)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tread end cement station (hot feed tread line 1) - manual application	OAC rule 3745-21-09(X)(2)(b)	exempt, pursuant to OAC rule 3745-21-09(X)(2)(b) (See A.I.2.a.)

2. Additional Terms and Conditions

- 2.a Any operation for which construction commenced prior to March 27, 1981 at the "Cooper Tire and Rubber Company" facility located at Lima and Western avenues, Findlay, Ohio, is exempt, unless a modification for any such operation has commenced on or after March 27, 1981.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P135 (P135)

Activity Description: Banbury Mixer #1 (includes mixer charge door/drop door)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Banbury mixer 1 (#27) - rubber, carbon black (with baghouse)	OAC rule 3745-31-05 (PTI 03-7432)	1.20 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-21-07(G). Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	See A.I.2.a.
	OAC rule 3745-21-07(G)	none (See Section A.II.2.)

2. Additional Terms and Conditions

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

II. Operational Restrictions

- The pressure drop across the main mixer baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.
- The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the process baghouse on a daily basis.
- The permittee shall maintain the following information each month for this emissions unit:
 - The company identification for each liquid organic material employed.
 - Documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

V. Testing Requirements

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

- 1.a Emission Limitation:
1.20 lbs PE/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5. [The permittee has demonstrated compliance with the limitation above based on the results of the emission testing conducted on September 17, 1995. The tested hourly PE rate was 0.17 lb PE/hr.]

- 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, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. No OC emission limitation was established for this emissions unit in PTI # 03-7432, which was issued on August 18, 1993. Subsequent emission testing showed that OC emissions were under-represented in the PTI application dated June 23, 1993. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P147 (P147)
Activity Description: Twin Two Calender Line #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
'Twin Two' calender line 1, including milling	OAC rule 3745-31-05 (PTI 03-10013)	31.40 lbs volatile organic compounds (VOC) /day 2.90 lbs hazardous air pollutants (HAP) /day

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, the requirements of OAC rule 3745-21-07(G) are not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification for each material employed.
 - b. The number of pounds of each material employed.
 - c. The VOC and HAP emission factors* for each material employed, in pounds per pound of rubber.
 - d. The total OC and HAP emission rates for all the materials employed, in pounds [i.e., summation of (b x c) for all materials, for OCs and for HAPs].
 - e. The total number of days the emissions unit was in operation.
 - f. The average daily VOC and HAP emission rates for all the materials employed, i.e., (d)/(e), in pounds per day (average).

* based on AP-42, Section 4.12 (12/98 Draft), as follows:

Milling, Compound 2, VOC - 1.10 E-04 lb VOC / lb rubber
 Milling, Compound 2, HAP - 6.39 E-06 lb HAP / lb rubber
 Calender, Compound 2, VOC - 5.59 E-05 lb VOC / lb rubber
 Calender, Compound 2, HAP - 1.27 E-05 lb HAP / lb rubber

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the average daily VOC and/or HAP emissions from the calender materials exceeded 31.4 and/or 2.9 pounds, respectively, and the actual average daily VOC and/or HAP emissions for each such month.

The deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

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

Emission Limitations:

31.40 lbs VOC/day

2.90 lbs HAP/day

Applicable Compliance Method:

Compliance with the daily allowable HAP and VOC emission limitations above shall be based upon the record keeping requirements in Section A.III.1 of the terms and conditions of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P149 (P149)

Activity Description: WSW Component Line #10

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
white sidewall component line #10 (rubber milling and extrusion)	OAC rule 3745-31-05 (PTI 03-9988)	22.83 lbs volatile organic compounds (VOC) /day, 4.17 tons VOC/yr 7.76 lbs hazardous air pollutants (HAP) /day, 1.42 tons HAP /yr

2. Additional Terms and Conditions

- 2.a The 22.83 lbs VOC/day and the 7.76 lbs HAP/day emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, the requirements of OAC rule 3745-21-07(G) are not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:
22.83 lbs VOC /day, 4.17 tons VOC /yr

Applicable Compliance Method:

The permittee may determine compliance with the daily allowable VOC emission limitation above as follows:

$$E = E1 + E2$$

where:

E = VOC emission rate (lbs/day) for milling (E1) and extruding (E2)

E1 = [milling maximum process throughput*, in lbs / day] X (EF1)

E2 = [extruding maximum process throughput*, in lbs / day] X (EF2)

EF1 = 1.10 E-04 lb VOC/ lb rubber milled**

EF2 = 1.23 E-05 lb VOC / lb rubber extruded**

* 187,000 lb/day, from the Title V permit application

** based on AP-42, Section 4.12 (12/98 Draft)

The annual limitation was developed by multiplying the daily limitation by 365, and then dividing by 2,000. Therefore, provided compliance with the hourly VOC emission limitation is maintained, compliance with the annual VOC limitation shall be ensured.

1.b Emission Limitations:
7.76 lbs HAP/day, 1.42 tons HAP/yr

Applicable Compliance Method:

The permittee may determine compliance with the daily allowable HAP emission limitation above as follows:

$$E = E1 + E2$$

where:

E = HAP emission rate (lbs/day) for milling (E1) and extruding (E2)

E1 = [milling maximum process throughput*, in lbs / day] X (EF1)

E2 = [extruding maximum process throughput*, in lbs / day] X (EF2)

EF1 = 6.39 E-06 lb HAP/ lb rubber milled**

EF2 = 3.52 E-05 lb HAP / lb rubber extruded**

* 187,000 lb/hr, from the Title V permit application

** based on AP-42, Section 4.12 (12/98 Draft)

The annual limitation was developed by multiplying the daily limitation by 365, and then dividing by 2,000. Therefore, provided compliance with the daily HAP limitation is maintained, compliance with the annual HAP limitation shall be ensured.

Facility Name: **The Cooper Tire & Rubber Company**
Facility ID: **03-32-01-0003**
Emissions Unit: **P149 (P149)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P150 (P150)

Activity Description: 10"x 6" Cold Feed Pin Barrel Tread Line #6 Extruder

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10" x 6" cold feed pin barrel tread line #6 (rubber extrusion)	OAC rule 3745-31-05 (PTI 03-9988)	4.29 lbs volatile organic compounds (VOC)/day, 0.78 ton VOC/yr 12.29 lbs hazardous air pollutants (HAP)/day, 2.24 tons HAP/yr

2. Additional Terms and Conditions

- 2.a The 4.29 lbs/day and 12.29 lbs HAP/day emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.
 - 2.b This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, the requirements of OAC rule 3745-21-07(G) are not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
4.29 lbs VOC/day, 0.78 ton VOC/yr

Applicable Compliance Method:

The permittee may determine compliance with the daily allowable VOC emission limitation above as follows:

$$E = [\text{extruding maximum process throughput}^*, \text{ in lbs / day}] \times (EF)$$

where:

E = VOC emission rate (lbs/day)

EF = 1.23 E-05 lb VOC/ lb rubber extruded**

* 349,000 lb/day, from the Title V permit application

** based on AP-42, Section 4.12 (12/98 Draft)

The annual limitation was developed by multiplying the daily limitation by 365, and then dividing by 2,000. Therefore, provided compliance with the daily VOC limitation is maintained, compliance with the annual VOC limitation shall be ensured.

- 1.b** Emission Limitations:
12.29 lbs HAP/day, 2.24 tons HAP/yr

Applicable Compliance Method:

The permittee may determine compliance with the daily allowable HAP emission limitation above as follows:

$$E = [\text{extruding maximum process throughput}^*, \text{ in lbs / day}] \times (EF)$$

where:

E = HAP emission rate (lbs/day)

EF = 3.52 E-05 lb HAP/ lb rubber extruded**

* 349,000 lb/day, from the Title V permit application

** based on AP-42, Section 4.12 (12/98 Draft)

The annual limitation was developed by multiplying the daily limitation by 365, and then dividing by 2,000. Therefore, provided compliance with the daily HAP limitation is maintained, compliance with the annual HAP limitation shall be ensured.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: R010 (R010)

Activity Description: Z Calender Fabric Dip Tank

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
'Z calender' fabric dip tank - water-based dip (associated with emissions unit P005)	OAC rule 3745-31-05 (PTI 03-5312)	0.16 lb organic compounds (OC) /hr 0.068 lb formaldehyde /hr 0.092 lb styrene /hr The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See Section A.II.2.)

2. Additional Terms and Conditions

- 2.a For purposes of calculating the organic compound emission rates for this emissions unit and the associated calender oven (emissions unit P005), the permittee shall utilize a value of 20 percent as the maximum percentage of the organic compounds (including formaldehyde and styrene) employed in this emissions unit that are emitted uncontrolled from this emissions unit. The remaining 80 percent of the organic compounds employed in the dip line shall be considered to be the uncontrolled emissions for the calender oven. This "split" of organic compound emissions between this emissions unit and the associated dip line is based upon calculations provided by the company that incorporated information from the dip line material supplier. The "split" of OC emissions between this emissions unit and the associated dip line shall be revised in accordance with the results of any future testing to determine the oven/dip line split (weight %).

II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the dip line:
 - a. The name and identification number of each material added to the dip tank.
 - b. The OC content, in pounds per gallon, of each material added to the dip tank.
 - c. The number of gallons of each material added to the dip tank.
 - d. The total potential (prior to applying the dip line /oven "split") uncontrolled daily OC emission rate for all materials employed in the dip line [summation of (b x c) for all materials], multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition A.I.2.a of this permit), in pounds per day.
 - e. The total number of hours this emissions unit was in operation.
 - f. The average hourly OC* emission rate, i.e., (d)/(e), in pounds per hour (average).

* No monitoring, record keeping and reporting requirements of the formaldehyde and styrene emissions are included at this time since there are no emission factors available to calculate these emissions. The permittee shall supply the Ohio EPA with the appropriate emission factors for formaldehyde and styrene when the PTI modification application, as required in Section VI.1, is submitted.

2. The permittee shall maintain the following information each day for this emissions unit:
 - a. The company identification for each coating and cleanup material employed in this emissions unit.
 - b. Documentation on whether or not each coating and cleanup material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC* emissions exceeded 0.16 pound per hour, and the actual average hourly OC emissions for each such day. The deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

* See note in Section A.III.1. above.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any photochemically reactive coating and/or cleanup material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

V. Testing Requirements

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

Emission Limitations:

0.16 lb VOC/hr

0.068 lb formaldehyde/hr*

0.092 lb styrene/hr*

Applicable Compliance Method:

If required, compliance with the hourly allowable emission limitations above shall be demonstrated pursuant to Method 18 (or any other USEPA-approved Method) of 40 CFR, Part 60, Appendix A.

The permittee shall also demonstrate compliance with the hourly allowable OC emission limitation through the record keeping requirements established in Section A.III.1 of this permit.

* No emission factors are available at this time that would enable the permittee to calculate the emission rates for formaldehyde and styrene (see Section A.III.1).

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials added to the dip tank.

VI. Miscellaneous Requirements

1. The permittee incorrectly represented the maximum emission rate for VOC in its application for PTI # 03-5312, dated July 11, 1990. As a result, the permittee cannot demonstrate compliance with the current PTI's hourly allowable emission limitations for OC, formaldehyde and styrene. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install modification application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: R012 (R012)

Activity Description: Tread Marking

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tread marking operation	OAC rule 3745-31-05 (PTI 03-11017)	2.46 lbs organic compounds (OC)/hr, 5.16 tons OC/yr, based upon a rolling, 12-month summation of the monthly OC emission rates 6.01 lbs OC per gallon of ink 6.76 lbs OC per gallon of thinner The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

- 2.a The OC emission limitation of 2.46 lbs/hr was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping, monitoring and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. The company identification for each ink and thinner employed.
 - b. The number of gallons of each ink and thinner employed.
 - c. The organic compound content of each ink and thinner employed, in pounds per gallon.
 - d. The total OC emission rate for all the inks and thinners employed, in pounds [i.e., summation (b x c) for all inks and all thinners).
 - e. The rolling, 12-month summation of the monthly OC emissions, in tons.
 - f. Documentation on whether or not each ink and thinner employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the ink and thinner OC content restrictions of 6.01 and 6.76 lbs/gallon, respectively, and the rolling, 12-month OC emission limitation of 5.16 tons.

The deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that summarize the annual OC emissions from this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any photochemically reactive ink and/or thinner in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
2.46 lbs OC /hr

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable OC emission limitation by multiplying the maximum ink/thinner usage rate (gallons/hr) for tread stripping and block lettering by the maximum OC content of all the inks/thinners (lbs/gallon).

If required, the permittee shall demonstrate compliance with the allowable hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
 - 1.b Emission Limitations:
5.16 tons OC/yr
6.01 lbs OC per gallon of ink
6.76 lbs OC per gallon of thinner

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable OC emission limitation and the OC content restrictions for inks and thinners through the record keeping requirements established in Section A.III.1 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coating materials employed.

Facility Name: **The Cooper Tire & Rubber Company**
Facility ID: **03-32-01-0003**
Emissions Unit: **R012 (R012)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Z002 (Z002)

Activity Description: Tire Inspection and Repair Station #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tire inspection and repair station #1	OAC rule 3745-21-07(G)	none (See A.1.2.a.)

2. Additional Terms and Conditions

- 2.a This facility is not located in a "Priority I" county (it is located in Hancock 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).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Z003 (Z003)

Activity Description: Tire Inspection and Repair Station #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
tire inspection and repair station #2	OAC rule 3745-21-07(G)	none (See A.1.2.a.)

2. Additional Terms and Conditions

- 2.a This facility is not located in a "Priority I" county (it is located in Hancock 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).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT
