



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
LUCAS COUNTY**

**CERTIFIED MAIL**

**Application No: 04-01257**

**DATE: 8/9/2001**

Rieter Automotive North America Inc  
Steve Thomas  
645 N Lallendorf Rd  
Oregon, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

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STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 04-01257**

Application Number: 04-01257  
APS Premise Number: 0448020035  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Rieter Automotive North America Inc  
Person to Contact: Steve Thomas  
Address: 645 N Lallendorf Rd  
Oregon, OH 43616

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**645 N Lallendorf Rd  
Oregon, Ohio**

Description of proposed emissions unit(s):  
**4 new SDA Plus/Hett Presses.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.)

**3. 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.

**4. 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.

**5. 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

**Rieter Automotive North America Inc**  
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**Issued: To be entered upon final issuance**  
lead to such sanctions

**Facility ID: 0448020035**

**Rieter Automotive North America Inc**

**Facility ID: 0448020035**

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Emissions Unit ID: **P029**

**Issued: To be entered upon final issuance**

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	10.84
OC	38.56

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P029: 800 pounds per hour steam assisted molding press, SDA Plus/Hett Press #1 with 3 emissions points		OAC rule 3745-17-07(B)(1) OAC 3745-17-08(B)(3)
Scrubber stack	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
Press emissions stack	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
Fugitive emissions	OAC rule 3745-31-05(A)(3)	

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Emissions Unit ID: **P029**

Applicable Emissions  
Limitations/Control Measures

0.21 pound per hour and 0.92 ton per year of particulates;  
0.66 pound per hour and 2.87 tons per year of OC.

20% opacity as a six-minute average, unless otherwise specified by the rule

See 2.a

0.39 pound per hour and 1.70 tons per year of particulates;  
1.47 pound per hour and 6.43 ton per year OC.

20% opacity as a six-minute average, unless otherwise specified by the rule

See 2.a

0.09 ton per year particulates;  
0.34 ton per year OC.

20% opacity as a three-minute average

See 2.a

**2. Additional Terms and Conditions**

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Emissions Unit ID: **P029**

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- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC 3745-31-05.
- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

## **B. Operational Restrictions**

### 1. Scrubber No. 1 Operational Restrictions

- a. The pressure drop across Scrubber #1 shall be continuously maintained at a value of not less than 0.7 inch of water at all times while the emissions unit is in operation.
- b. The Scrubber #1 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
- c. The pH of the Scrubber #1 liquor shall be maintained within the range of 3 to 6.
- d. The oxidation-reduction potential of the Scrubber #1 liquor shall be maintained within the range of 200 to 600 (unitless).

### 2. Scrubber No. 2 Operational Restrictions

The permittee has identified that Scrubber #2 may be used in lieu of Scrubber No. 1 in the future. The following operational restrictions apply if emissions are controlled by Scrubber No. 2 rather than Scrubber No. 1.

- a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
- b. The Scrubber #2 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
- c. The pH of the Scrubber #2 liquor shall be maintained within the range of 3 to 6.

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- d. The oxidation-reduction potential of the Scrubber #2 liquor shall be maintained within the range of 200 to 600 (unitless).

### C. Monitoring and/or Recordkeeping Requirements

#### 1. Scrubber Monitoring Requirements

- a. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- b. The permittee shall properly operate and maintain equipment to continuously monitor the pH of the scrubber liquor and the oxidation-reduction potential of the scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

#### 2. Scrubber Recordkeeping Requirements

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, once per shift.
  - b. The scrubber water flow rate, in gallons per minute, once per shift.
  - c. The pH of the scrubber liquor on an hourly basis.
  - d. The oxidation-reduction potential of the scrubber liquor on an hourly basis.
  - e. A log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

### D. Reporting Requirements

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1. Scrubber Reporting Requirements
  - a. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods of time during which the following parameters for Scrubber #1 or Scrubber #2 were not maintained at or above the required levels while the emissions unit is in operation:
    - i. the pressure drop across the scrubber;
    - ii. the scrubber water flow rate;
    - iii. the pH of the scrubber liquor; and,
    - iv. the oxidation-reduction potential of the scrubber liquor.
  - b. These semi-annual reports shall be submitted by February 1 and August 1 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
20% opacity as a six-minute average (Scrubber stack and press emissions stack)  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
  
20% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

0.21 pound per hour of particulates. (Scrubber stack)

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.92 ton per year of particulates (Scrubber stack)

Applicable Compliance Method:

Compliance with the 0.21 lb/hr limit constitutes compliance with the ton/yr limit.

e. Emission Limitation:

0.39 pound per hour of particulates. (Press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

1.70 tons per year of particulates (Press emissions stack)

Applicable Compliance Method:

Compliance with the 0.39 lb/hr limit constitutes compliance with the ton/yr limit.

g. Emission Limitation:

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0.09 tons per year of particulates (Fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 20% opacity as a 3-minute average constitutes compliance with the ton/yr limit.

h. Emission Limitation:

0.66 pound per hour of organic compounds (OC) (Scrubber stack)

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).

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- i. Emission Limitation:  
  
2.87 tons per year of OC (Scrubber stack)  
  
Applicable Compliance Method  
  
Compliance with the 0.66 lb/hr limit constitutes compliance with the ton/yr limit.
- j. Emission Limitation:  
  
1.47 pound per hour of organic compounds (OC) (Press emissions stack)  
  
Applicable Compliance Method:  
  
If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).
- k. Emission Limitation:  
  
6.43 tons per year of OC (Press emissions stack)  
  
Applicable Compliance Method  
  
Compliance with the 1.47 lb/hr limit constitutes compliance with the ton/yr limit.
- l. Emission Limitation:  
  
0.34 ton per year of OC (fugitive)  
  
Applicable Compliance Method  
  
If required, the permittee shall determine a fugitive emission factor by conducting performance testing according to Method 204 of 40 CFR Part 60, Appendix A.
- m. Emission Limitation:  
  
Potential emissions shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

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Emissions Unit ID: **P029**

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Applicable Compliance Method

The monitoring & recordkeeping requirement C.3 will be used to demonstrate compliance.

## **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lbs/hr):	1.15
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	21.41
MAGLC (ug/m3):	404.76

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
    - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
    - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
6. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an

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acceptable level.

Emissions Unit ID: **P029**

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Emissions Unit ID: P030

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P030: 800 pounds per hour steam assisted molding press, SDA Plus/Hett Press #2 with 3 emissions points	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)(1) OAC 3745-17-08(B)(3)
Scrubber stack	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(A)(2)
Press emissions stack	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(A)(2)
Fugitive emissions	

Applicable Emissions  
Limitations/Control Measures

0.21 pound per hour and 0.92 ton  
per year of particulates;  
0.66 pound per hour and 2.87 tons  
per year of OC.

20% opacity as a six-minute  
average, unless otherwise specified  
by the rule

See 2.a

0.39 pound per hour and 1.70 tons  
per year of particulates;  
1.47 pound per hour and 6.43 ton  
per year OC.

20% opacity as a six-minute  
average, unless otherwise specified  
by the rule

See 2.a

0.09 ton per year particulates;  
0.34 ton per year OC.

20% opacity as a three-minute  
average

See 2.a

**2. Additional Terms and Conditions**

**2.a** The emission limitation established by this applicable regulation is equivalent to or less

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Emissions Unit ID: **P030**

**Issued: To be entered upon final issuance**

stringent than the emission limitation established by OAC 3745-31-05.

- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

## **B. Operational Restrictions**

### 1. Scrubber No. 1 Operational Restrictions

- a. The pressure drop across Scrubber #1 shall be continuously maintained at a value of not less than 0.7 inch of water at all times while the emissions unit is in operation.
- b. The Scrubber #1 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
- c. The pH of the Scrubber #1 liquor shall be maintained within the range of 3 to 6.
- d. The oxidation-reduction potential of the Scrubber #1 liquor shall be maintained within the range of 200 to 600 (unitless).

### 2. Scrubber No. 2 Operational Restrictions

The permittee has identified that Scrubber #2 may be used in lieu of Scrubber No. 1 in the future. The following operational restrictions apply if emissions are controlled by Scrubber No. 2 rather than Scrubber No. 1.

- a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
- b. The Scrubber #2 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
- c. The pH of the Scrubber #2 liquor shall be maintained within the range of 3 to 6.
- d. The oxidation-reduction potential of the Scrubber #2 liquor shall be maintained within the range of 200 to 600 (unitless).

**C. Monitoring and/or Recordkeeping Requirements**

1. Scrubber Monitoring Requirements

- a. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- b. The permittee shall properly operate and maintain equipment to continuously monitor the pH of the scrubber liquor and the oxidation-reduction potential of the scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

2. Scrubber Recordkeeping Requirements

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, once per shift.
  - b. The scrubber water flow rate, in gallons per minute, once per shift.
  - c. The pH of the scrubber liquor on an hourly basis.
  - d. The oxidation-reduction potential of the scrubber liquor on an hourly basis.
  - e. A log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

## D. Reporting Requirements

### 1. Scrubber Reporting Requirements

- a. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods of time during which the following parameters for Scrubber #1 or Scrubber #2 were not maintained at or above the required levels while the emissions unit is in operation:
    - i. the pressure drop across the scrubber;
    - ii. the scrubber water flow rate;
    - iii. the pH of the scrubber liquor; and,
    - iv. the oxidation-reduction potential of the scrubber liquor.
  - b. These semi-annual reports shall be submitted by February 1 and August 1 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

## E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
20% opacity as a six-minute average (Scrubber stack and press emissions stack)  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
  
20% opacity as a three-minute average (fugitive emissions)

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Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

0.21 pound per hour of particulates. (Scrubber stack)

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.92 ton per year of particulates (Scrubber stack)

Applicable Compliance Method:

Compliance with the 0.21 lb/hr limit constitutes compliance with the ton/yr limit.

e. Emission Limitation:

0.39 pound per hour of particulates. (Press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

1.70 tons per year of particulates (Press emissions stack)

Applicable Compliance Method:

Compliance with the 0.39 lb/hr limit constitutes compliance with the ton/yr limit.

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g. Emission Limitation:

0.09 tons per year of particulates (Fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 20% opacity as a 3-minute average constitutes compliance with the ton/yr limit.

h. Emission Limitation:

0.66 pound per hour of organic compounds (OC) (Scrubber stack)

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).

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- i. Emission Limitation:  
  
2.87 tons per year of OC (Scrubber stack)  
  
Applicable Compliance Method  
  
Compliance with the 0.66 lb/hr limit constitutes compliance with the ton/yr limit.
- j. Emission Limitation:  
  
1.47 pound per hour of organic compounds (OC) (Press emissions stack)  
  
Applicable Compliance Method:  
  
If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).
- k. Emission Limitation:  
  
6.43 tons per year of OC (Press emissions stack)  
  
Applicable Compliance Method  
  
Compliance with the 1.47 lb/hr limit constitutes compliance with the ton/yr limit.
- l. Emission Limitation:  
  
0.34 ton per year of OC (fugitive)  
  
Applicable Compliance Method  
  
If required, the permittee shall determine a fugitive emission factor by conducting performance testing according to Method 204 of 40 CFR Part 60, Appendix A.
- m. Emission Limitation:  
  
Potential emissions shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.  
  
Applicable Compliance Method

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**Emissions Unit ID: P030**

The monitoring & recordkeeping requirement C.3 will be used to demonstrate compliance.

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Emissions Unit ID: P030

## F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lbs/hr):	1.15
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	21.41
MAGLC (ug/m3):	404.76

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
  - c. changes in the composition of the materials used, or use of new materials, that would

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- result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
    - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
    - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
    - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
  4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
  5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
    - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
    - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
  6. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P031: 800 pounds per hour steam assisted molding press, SDA Plus/Hett Press #3 with 3 emissions points	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)(1) OAC 3745-17-08(B)(3)
Scrubber stack	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
Press emissions stack	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
Fugitive emissions	OAC rule 3745-31-05(A)(3)	

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Emissions Unit ID: **P031**

Applicable Emissions  
Limitations/Control Measures

0.21 pound per hour and 0.92 ton per year of particulates;  
0.66 pound per hour and 2.87 tons per year of OC.

20% opacity as a six-minute average, unless otherwise specified by the rule

See 2.a

0.39 pound per hour and 1.70 tons per year of particulates;  
1.47 pound per hour and 6.43 ton per year OC.

20% opacity as a six-minute average, unless otherwise specified by the rule

See 2.a

0.09 ton per year particulates;  
0.34 ton per year OC.

20% opacity as a three-minute average

See 2.a

**2. Additional Terms and Conditions**

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- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC 3745-31-05.
- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

## **B. Operational Restrictions**

### 1. Scrubber No. 1 Operational Restrictions

- a. The pressure drop across Scrubber #1 shall be continuously maintained at a value of not less than 0.7 inch of water at all times while the emissions unit is in operation.
- b. The Scrubber #1 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
- c. The pH of the Scrubber #1 liquor shall be maintained within the range of 3 to 6.
- d. The oxidation-reduction potential of the Scrubber #1 liquor shall be maintained within the range of 200 to 600 (unitless).

### 2. Scrubber No. 2 Operational Restrictions

The permittee has identified that Scrubber #2 may be used in lieu of Scrubber No. 1 in the future. The following operational restrictions apply if emissions are controlled by Scrubber No. 2 rather than Scrubber No. 1.

- a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
- b. The Scrubber #2 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
- c. The pH of the Scrubber #2 liquor shall be maintained within the range of 3 to 6.

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- d. The oxidation-reduction potential of the Scrubber #2 liquor shall be maintained within the range of 200 to 600 (unitless).

### C. Monitoring and/or Recordkeeping Requirements

#### 1. Scrubber Monitoring Requirements

- a. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- b. The permittee shall properly operate and maintain equipment to continuously monitor the pH of the scrubber liquor and the oxidation-reduction potential of the scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

#### 2. Scrubber Recordkeeping Requirements

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, once per shift.
  - b. The scrubber water flow rate, in gallons per minute, once per shift.
  - c. The pH of the scrubber liquor on an hourly basis.
  - d. The oxidation-reduction potential of the scrubber liquor on an hourly basis.
  - e. A log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

### D. Reporting Requirements

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1. Scrubber Reporting Requirements
  - a. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods of time during which the following parameters for Scrubber #1 or Scrubber #2 were not maintained at or above the required levels while the emissions unit is in operation:

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- i. the pressure drop across the scrubber;
    - ii. the scrubber water flow rate;
    - iii. the pH of the scrubber liquor; and,
    - iv. the oxidation-reduction potential of the scrubber liquor.
  - b. These semi-annual reports shall be submitted by February 1 and August 1 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
20% opacity as a six-minute average (Scrubber stack and press emissions stack)  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
  
20% opacity as a three-minute average (fugitive emissions)  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3).
  - c. Emission Limitation:

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0.21 pound per hour of particulates. (Scrubber stack)

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Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.92 ton per year of particulates (Scrubber stack)

Applicable Compliance Method:

Compliance with the 0.21 lb/hr limit constitutes compliance with the ton/yr limit.

e. Emission Limitation:

0.39 pound per hour of particulates. (Press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

1.70 tons per year of particulates (Press emissions stack)

Applicable Compliance Method:

Compliance with the 0.39 lb/hr limit constitutes compliance with the ton/yr limit.

g. Emission Limitation:

0.09 tons per year of particulates (Fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 20% opacity as a 3-minute average constitutes compliance with the ton/yr limit.

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- h. Emission Limitation:  
0.66 pound per hour of organic compounds (OC) (Scrubber stack)

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Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).

i. Emission Limitation:

2.87 tons per year of OC (Scrubber stack)

Applicable Compliance Method:

Compliance with the 0.66 lb/hr limit constitutes compliance with the ton/yr limit.

j. Emission Limitation:

1.47 pound per hour of organic compounds (OC) (Press emissions stack)

Applicable Compliance Method:

If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).

k. Emission Limitation:

6.43 tons per year of OC (Press emissions stack)

Applicable Compliance Method:

Compliance with the 1.47 lb/hr limit constitutes compliance with the ton/yr limit.

l. Emission Limitation:

0.34 ton per year of OC (fugitive)

Applicable Compliance Method

If required, the permittee shall determine a fugitive emission factor by conducting performance testing according to Method 204 of 40 CFR Part 60, Appendix A.

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m. Emission Limitation:

Potential emissions shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

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Applicable Compliance Method

The monitoring & recordkeeping requirement C.3 will be used to demonstrate compliance.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lbs/hr):	1.15
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	21.41
MAGLC (ug/m3):	404.76

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not

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including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

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- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
6. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P032 : 800 pounds per hour steam assisted molding press, SDA Plus Press #4 with 3 emissions points		OAC rule 3745-17-07(B)(1) OAC 3745-17-08(B)(3)
Scrubber stack	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
Press emissions stack	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
Fugitive emissions	OAC rule 3745-31-05(A)(3)	

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Applicable Emissions  
Limitations/Control Measures

0.21 pound per hour and 0.92 ton  
per year of particulates;  
0.66 pound per hour and 2.87 tons  
per year of OC.

20% opacity as a six-minute  
average, unless otherwise specified  
by the rule

See 2.a

0.39 pound per hour and 1.70 tons  
per year of particulates;  
1.47 pound per hour and 6.43 ton  
per year OC.

20% opacity as a six-minute  
average, unless otherwise specified  
by the rule

See 2.a

0.09 ton per year particulates;  
0.34 ton per year OC.

20% opacity as a three-minute  
average

See 2.a.

**2. Additional Terms and Conditions**

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- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC 3745-31-05.
- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

## **B. Operational Restrictions**

- 1. Scrubber No. 1 Operational Restrictions
  - a. The pressure drop across Scrubber #1 shall be continuously maintained at a value of not less than 0.7 inch of water at all times while the emissions unit is in operation.
  - b. The Scrubber #1 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
  - c. The pH of the Scrubber #1 liquor shall be maintained within the range of 3 to 6.
  - d. The oxidation-reduction potential of the Scrubber #1 liquor shall be maintained within the range of 200 to 600 (unitless).
- 2. Scrubber No. 2 Operational Restrictions

The permittee has identified that Scrubber #2 may be used in lieu of Scrubber No. 1 in the future. The following operational restrictions apply if emissions are controlled by Scrubber No. 2 rather than Scrubber No. 1.

  - a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.
  - b. The Scrubber #2 water flow rate shall be continuously maintained at a value of not less than 900 gallons per minute at all times while the emissions unit is in operation.
  - c. The pH of the Scrubber #2 liquor shall be maintained within the range of 3 to 6.

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- d. The oxidation-reduction potential of the Scrubber #2 liquor shall be maintained within the range of 200 to 600 (unitless).

### C. Monitoring and/or Recordkeeping Requirements

#### 1. Scrubber Monitoring Requirements

- a. The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- b. The permittee shall properly operate and maintain equipment to continuously monitor the pH of the scrubber liquor and the oxidation-reduction potential of the scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

#### 2. Scrubber Recordkeeping Requirements

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, once per shift.
  - b. The scrubber water flow rate, in gallons per minute, once per shift.
  - c. The pH of the scrubber liquor on an hourly basis.
  - d. The oxidation-reduction potential of the scrubber liquor on an hourly basis.
  - e. A log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

### D. Reporting Requirements

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1. Scrubber Reporting Requirements

- a. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods of time during which the following parameters for Scrubber #1 or Scrubber #2 were not maintained at or above the required levels while the emissions unit is in operation:

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- i. the pressure drop across the scrubber;
    - ii. the scrubber water flow rate;
    - iii. the pH of the scrubber liquor; and,
    - iv. the oxidation-reduction potential of the scrubber liquor.
  - b. These semi-annual reports shall be submitted by February 1 and August 1 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).
2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
20% opacity as a six-minute average (Scrubber stack and press emissions stack)  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
  
20% opacity as a three-minute average (fugitive emissions)  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3).
  - c. Emission Limitation:

**Rieter Automotive North America Inc**  
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**Issue**

**Facility ID: 0448020035**

**Emissions Unit ID: P032**

0.21 pound per hour of particulates. (Scrubber stack)

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Emissions Unit ID: **P032**

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.92 ton per year of particulates (Scrubber stack)

Applicable Compliance Method:

Compliance with the 0.21 lb/hr limit constitutes compliance with the ton/yr limit.

e. Emission Limitation:

0.39 pound per hour of particulates. (Press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

1.70 tons per year of particulates (Press emissions stack)

Applicable Compliance Method:

Compliance with the 0.39 lb/hr limit constitutes compliance with the ton/yr limit.

g. Emission Limitation:

0.09 tons per year of particulates (Fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 20% opacity as a 3-minute average constitutes compliance with the ton/yr limit.

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**Issued: To be entered upon final issuance**

Emissions Unit ID: **P032**

h. Emission Limitation:

0.66 pound per hour of organic compounds (OC) (Scrubber stack)

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Issued: To be entered upon final issuance

Emissions Unit ID: P032

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).

i. Emission Limitation:

2.87 tons per year of OC (Scrubber stack)

Applicable Compliance Method

Compliance with the 0.66 lb/hr limit constitutes compliance with the ton/yr limit.

j. Emission Limitation:

1.47 pound per hour of organic compounds (OC) (Press emissions stack)

Applicable Compliance Method:

If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).

k. Emission Limitation:

6.43 tons per year of OC (Press emissions stack)

Applicable Compliance Method

Compliance with the 1.47 lb/hr limit constitutes compliance with the ton/yr limit.

l. Emission Limitation:

0.34 ton per year of OC (fugitive)

Applicable Compliance Method

If required, the permittee shall determine a fugitive emission factor by conducting

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Emissions Unit ID: **P032**

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performance testing according to Method 204 of 40 CFR Part 60, Appendix A.

m. Emission Limitation:

Potential emissions shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

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Applicable Compliance Method

The monitoring & recordkeeping requirement C.3 will be used to demonstrate compliance.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lbs/hr):	1.15
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	21.41
MAGLC (ug/m3):	404.76

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not

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**PTI Application 04-01057**

**Issue**

**Facility ID: 0448020035**

Emissions Unit ID: **P032**

including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

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- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
6. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

**NEW SOURCE REVIEW FORM B**

PTI Number: 04-01257 Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses CITY/TWP Oregon

Emissions Unit ID: P032

SIC CODE 2291 SCC CODE 3-14-9999-99 EMISSIONS UNIT ID P029

EMISSIONS UNIT DESCRIPTION 800 pounds per hour stem assisted molding press, SDA Plus/Hett Press 1 with 3 emissions points

DATE INSTALLED Not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Unclassified	0.47	2.04	0.62	2.71
PM <sub>10</sub>	Unclassified	NA	NA	NA	NA
Sulfur Dioxide		NA	NA	NA	NA
Organic Compounds	Unclassified	1.65	7.22	2.20	9.64
Nitrogen Oxides		NA	NA	NA	NA
Carbon Monoxide		NA	NA	NA	NA
Lead		NA	NA	NA	NA
Other: Air Toxics	Ammonia	0.14	0.62	0.29	1.26

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Control of the tool emissions with a wet scrubber and no control of the press emissions based on BAT analysis submitted by Rieter

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: ammonia

**NEW SOURCE REVIEW FORM B**

PTI Number: 04-01257 Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses

CITY/TWP Oregon

Emissions Unit ID: P032

SIC CODE 2291 SCC CODE 3-14-9999-99 EMISSIONS UNIT ID P030

EMISSIONS UNIT DESCRIPTION 800 pounds per hour steam assisted molding press, SDA Plus/Hett 2 with 3 emissions points

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Unclassified	0.47	2.04	0.62	2.71
PM <sub>10</sub>	Unclassified	NA	NA	NA	NA
Sulfur Dioxide		NA	NA	NA	NA
Organic Compounds	Unclassified	1.65	7.22	2.20	9.64
Nitrogen Oxides		NA	NA	NA	NA
Carbon Monoxide		NA	NA	NA	NA
Lead		NA	NA	NA	NA
Other: Air Toxics	Ammonia	0.14	0.62	0.29	1.26

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Control of the tool emissions with a wet scrubber and no control of the press emissions based on BAT analysis submitted by Rieter

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: ammonia

**NEW SOURCE REVIEW FORM B**

PTI Number: 04-01257 Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses CITY/TWP Oregon

Emissions Unit ID: **P032**

SIC CODE 2291 SCC CODE 3-14-9999-99 EMISSIONS UNIT ID P031

EMISSIONS UNIT DESCRIPTION 800 pounds per hour steam assisted molding press, SDA Plus/Hett 3 with 3 emissions points

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Unclassified	0.47	2.04	0.62	2.71
PM <sub>10</sub>	Unclassified	NA	NA	NA	NA
Sulfur Dioxide		NA	NA	NA	NA
Organic Compounds	Unclassified	1.65	7.22	2.20	9.64
Nitrogen Oxides		NA	NA	NA	NA
Carbon Monoxide		NA	NA	NA	NA
Lead		NA	NA	NA	NA
Other: Air Toxics	Ammonia	0.14	0.62	0.29	1.26

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Control of the tool emissions with a wet scrubber and no control of the press emissions based on BAT analysis submitted by Rieter

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: ammonia

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PTI Number: 04-01257 Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses CITY/TWP Oregon

Emissions Unit ID: **P032**

SIC CODE 2291 SCC CODE 3-14-9999-99 EMISSIONS UNIT ID P032

EMISSIONS UNIT DESCRIPTION 800 pounds per hour steam assisted molding press, SDA Plus/Hett Press 4 with 3 emissions points

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Unclassified	0.47	2.04	0.62	2.71
PM <sub>10</sub>	Unclassified	NA	NA	NA	NA
Sulfur Dioxide		NA	NA	NA	NA
Organic Compounds	Unclassified	1.65	7.22	2.20	9.64
Nitrogen Oxides		NA	NA	NA	NA
Carbon Monoxide		NA	NA	NA	NA
Lead		NA	NA	NA	NA
Other: Air Toxics	Ammonia	0.14	0.62	0.29	1.26

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Control of the tool emissions with a wet scrubber and no control of the press emissions based on BAT analysis submitted by Rieter

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES \_\_\_\_\_ NO \_\_\_\_\_

IDENTIFY THE AIR CONTAMINANTS: ammonia

**Emissions Calculations**

Two Emission Points from the molding presses ("press" & "tool") lead to 3 emission points from the facility. The "tool" emissions are controlled by the scrubber and exit the scrubber stack. 95% of the "press" emissions exit the press emission stack while 5% of the "press" emissions are fugitive.

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses

CITY/TWP Oregon

**Allowable**

	Tool	Press	Press Stack 0.95(Press)	Fugitive 0.05(Press)	Scrubber Removed	Scrubber Stack	
<b>lb/hr</b>							
PM	0.273	0.409	0.38855	0.02045	0.063	0.21	
OC	1.009	1.545	1.46775	0.07725	0.353	0.656	
Phenol	0.159	0.006	0.0057	0.0003	0.142	0.017	
Formald	0.159	0.005	0.00475	0.00025	0.096	0.063	
Ammonia	1.182	0.098	0.0931	0.0049	0.993	0.189	0.287
	Tool	Press	Press Stack 0.95(Press)	Fugitive 0.05(Press)	Scrubber Removed	Scrubber Stack	TOTAL
<b>ton/yr</b>							
PM	1.195	1.792	1.7024	0.0896	0.275	0.92	2.712
OC	4.42	6.765	6.42675	0.33825	1.547	2.873	9.638
Phenol	0.698	0.027	0.02565	0.00135	0.621	0.077	
Formald	0.698	0.022	0.0209	0.0011	0.419	0.279	
Ammonia	5.175	0.431	0.40945	0.02155	4.347	0.828	1.259

**Actual**

	Tool	Press	Press Stack 0.95(Press)	Fugitive 0.05(Press)	Scrubber Removed	Scrubber Stack	TOTAL
<b>lb/hr</b>							
PM	0.205	0.307	0.29165	0.01535	0.047	0.158	0.465
OC	0.756	1.158	1.1001	0.0579	0.265	0.491	1.649
Phenol	0.112	0.005	0.00475	0.00025	0.099	0.013	0.018
Formald	0.112	0.004	0.0038	0.0002	0.067	0.045	0.049
Ammonia	0.888	0	0	0	0.746	0.142	0.142
	Tool	Press	Press Stack 0.95(Press)	Fugitive 0.05(Press)	Scrubber Removed	Scrubber Stack	TOTAL
<b>ton/yr</b>							
PM	0.896	1.345	1.27775	0.06725	0.206	0.69	2.035
OC	3.311	5.072	4.8184	0.2536	1.159	2.152	7.224
Phenol	0.491	0.022	0.0209	0.0011	0.437	0.054	0.076
Formald	0.491	0.018	0.0171	0.0009	0.295	0.196	0.214
Ammonia	3.889	0	0	0	3.267	0.622	0.622

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

**NEW SOURCE REVIEW FORM B**

PTI Number: 04-01257 Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses CITY/TWP Oregon

Emissions Unit ID: **P032**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
Calculations (required)	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
Modeling form/results	<input checked="" type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
 Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

SAMPLE CALCULATIONS

Description

This permit to install is for four 800 pound per hour steam-assisted molding presses used to create sound dampening and insulating panels for the automotive industry. The SDA Plus/Hett Presses will be a new operation at Rieter. These presses will have the option to operate as either an SDA Plus press or a Hett press at any given time depending on the type of product being made. The emissions that are released during processing include particulate matter, organic compounds, phenol, formaldehyde, and ammonia. Emission factors for this new operation were derived for each pollutant from the greater of the emission factors from the SDA Plus or Hett operations.

**6 NEW SOURCE REVIEW FORM B**

PTI Number: 04-01257

Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses

CITY/TWP Oregon

Emissions Unit ID: **P032**

The insulating panels are created by mixing and heat curing a powdered polymer in a stabilized matrix (e.g., cotton batting). Each press has two emissions points, "press" and "tool", which lead to 3 emissions point types from the facility (scrubber stack (1), press emissions stack (4) and fugitive). The molding press uses steam and pressure to mold the part. While the press is in a closed position, emissions are vented from the "tool" to a wet scrubber. After the part is heated and compressed, the press is lifted and emissions are given off and are referred to as "press" emissions. 95% of the press emissions are vented uncontrolled to the press emissions stack and 5% of the press emissions are emitted as fugitives. BAT for these presses is controlling the "tool" emissions with a wet scrubber and no control of the "press" emissions.

**Applicable regulations**

- OAC rule 3745-17-07(A)(1) 20% opacity as a 6-minute average (stack)
- OAC rule 3745-17-07(B)(1) 20% opacity as a 3-minute average (fugitives)
- OAC 3745-17-08(B)(3) 0.030 grains per dscf or no visible emissions
- OAC rule 3745-17-11(A)(2) 2.22 pounds particulates per hour
- OAC 3745-31-05(A)(3) BAT
- OAC rule 3745-31-05(D) potential emissions of hazardous air pollutants (HAPs)

**BAT**

Based on the cost evaluation and the results of previous stack testing of a similar press, Rieter has proposed control of the "tool" emissions with a wet scrubber and no control for the press emissions.

**Permit allowable emissions (each press)**

OC Rieter submitted emission factors derived from stack test data from a similar press located at their facility in Lowell, IN.

Press Emissions 1.93E-03 lb/lb of product

Tool Emissions 1.26E-03 lb/lb of product

The Scrubber will control the tool emissions with a 35% control efficiency. (The efficiency of controlling the pollutants with odors is much higher: 89% for phenol, 60% for formaldehyde and 84% for ammonia). 95% of the press emissions will be vented to the press emissions stack and 5% of the press emissions will be fugitive.

Scrubber Stack: 0.66 lb/hr and 2.87 ton/yr

Press Emissions Stack: 1.47 lb/hr and 6.43 ton/yr

Fugitive 0.34 ton/yr

Total (4 Presses) 38.56 tons/yr

PM Rieter has submitted the following emission factors from a similar press.

FACILITY DESCRIPTION 4 new SDA Plus/Hett PressesCITY/TWP Oregon

Press Emissions 5.12E-04 lb/lb product

Tool Emissions 3.41E-04 lb/lb product

The Scrubber will control the particulate emissions with a 23% control efficiency. 95% of the press emissions will be vented to the press emissions stack and 5% of the press emissions will be fugitive.

Scrubber Stack: 0.21 lb/hr and 0.92 ton/yr

Press Emissions Stack: 0.39 lb/hr and 1.70 tons/yr

Fugitive 0.09 ton/yr

Total (4 Presses) 10.84 tons/yr

Opacity 20% as a 6-minute average for stack emissions and 20% opacity as a 3-minute average for fugitive emissions.

Actual process emissions (each press)

OC Using the emission factors and control efficiencies listed above and 600 lbs/hr production rate:

Scrubber Stack: 0.49 lb/hr and 2.15 ton/yr

Press Emissions Stack: 1.10 and 4.82 ton/yr

Fugitive 0.25 ton/yr

Total (4 Presses) 28.90 tons/yr

PM

Scrubber Stack: 0.16 lb/hr and 0.69 ton/yr

Press Emissions Stack: 0.29 lb/hr and 1.28 tons/yr

Fugitive 0.07 ton/yr

Total (4 Presses) 8.16 tons/yr

Air Toxics

Ammonia, phenol and formaldehyde will be emitted from these emissions units, however, only ammonia will be emitted at a rate greater than 1 ton per year as a total from all 4 emissions units. Rieter estimates an emission of 5.04 tons of ammonia per year (1.26 TPY per press) or 0.14 gram per second. Ammonia has a TWA of 25 ppm and a STEL/C of 35 ppm (from ACGIH 1998). At a molecular weight of 17.03 this equates to a TLV of 17,000  $\mu\text{g}/\text{m}^3$  and an allowable MAGLC of 410  $\mu\text{g}/\text{m}^3$ . Modeling indicates a maximum ground level concentration of 34.5  $\mu\text{g}/\text{m}^3$  total for when all

**NEW SOURCE REVIEW FORM B**

PTI Number: 04-01257

Facility ID: 0448020035

FACILITY NAME Rieter Automotive North America Inc

FACILITY DESCRIPTION 4 new SDA Plus/Hett Presses

CITY/TWP Oregon

Emissions Unit ID: **P032**

press emissions are modeled together.

Fees

4 processes at 0 to 1,000 pounds per hour = 4(\$200) = \$800

**Please complete:**

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	10.84
OC	38.56

70 NEW SC

PTI Num

FACILITY

FACILITY DESCRIPTION

4 new SDA Plus/Hett Presses

CITY/TWP

Emissions Unit ID: **P032** \_\_\_\_\_

Oregon