

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **04-01353**

A. Source Description

The permit to install is for four new 600 pound per hour steam-assisted molding presses used to create sound dampening and insulating panels for the automotive industry. 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 (PE), organic compounds (OC), phenol (a HAP), formaldehyde (a HAP), and ammonia (an air toxic). Emission factors for the presses were derived for each pollutant from the greater of the emission factors from the SDA Plus or Hett operations.

B. Facility Emissions and Attainment Status

The facility requested federally enforceable emissions so that plant-wide potential emissions remain below the threshold level for a major source under TV.

Lucas County is classified as attainment or unclassified for all criteria pollutants:

<u>Pollutant</u>	<u>Classification</u>
PM-10	Unclassified
Sulfur Dioxide	Attainment
Nitrogen Oxides	Unclassified
Carbon Monoxide	Attainment
Lead	Unclassified
Ozone	Attainment 1-hr, Unclassified 8-hr

C. Source Emissions

Since the permittee requested the PTI to be issued as federally enforceable, the net change in plant-wide potential emissions are shown in the following table. The changes are based on what was reported as potential emissions taken from the current PTI application and PTI 04-01257 application, dated March 12, 2001.

Total Potential Emissions (Plant-wide)	OC (TPY)	PE (TPY)	Ammonia (TPY)	Formaldehyde (TPY)	Phenol (TPY)
PTI 04-01353, P033 thru P036	98.68	69.22	11.07	3.10	3.56
PTI 04-01257, P029 thru P032	85.85	69.41	12.86	2.41	5.32
Net Difference between 4 units permitted in 1/02	12.83	-0.19	-1.79	0.69	-1.76

The net increase/decrease is minimal since Rieter permanently shut down sources P009, P010, P020, P021 and P024. Upon startup of the new sources in this PTI, the following sources will also be permanently shut down: P018 and P019. The emission units that are shutdown are reflected in the total potential emissions for PTI 04-01353.

D. Conclusion

The net increase of emissions is less than the major source threshold of 100 tons per year of OC and PE, and less than the major HAP thresholds of 10 tons per year of each individual HAP and 25 tons/yr of all HAPs combined. This permit to install results in a minor increase of OC emissions and minor decrease in PE emissions, but remains a synthetic minor source.



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: 04-01353

DATE: 3/25/2004

Rieter Automotive North America Inc
Steve Thomas
645 N Lallendorf Rd
Oregon, OH 43616

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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

TDES

Toledo Metropolitan Area Council of Governments

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LUCAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 04-01353 FOR AN AIR CONTAMINANT SOURCE FOR
RIETER AUTOMOTIVE NORTH AMERICA INC

On 3/25/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Rieter Automotive North America Inc**, located at **645 N Lallendorf Rd, Oregon, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01353:

installing four(4) molding presses that produces sound absorbers.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]



**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 04-01353

Application Number: 04-01353
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):
installing four(4) molding presses that produces sound absorbers.

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

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

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 lead to such sanctions

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 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

Rieter Automotive North America Inc
PTI Application: 04-01353
Issued: To be entered upon final issuance
3745-77-08(C)(3)(d).

Facility ID: 0448020035

Emissions Unit ID: P033

- 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 ninety (90) 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>
OC	28.90
PE	8.14

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>fugitive emissions</u>	<u>Applicable Rules/Requirements</u>
P033 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 5 with 3 emission points:		
tool emissions-scrubber stack	facility HAP restriction	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)

Rieter

PTI A

Emissions Unit ID: P033

Issued: To be entered upon final issuance

OAC rule 3745-31-05(A)(3)

See Section 2.c.

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)(3)

OAC rule 3745-31-05(C)

0.16 pound per hour and 0.69 ton per year of particulates;
0.49 pound per hour and 2.15 tons per year of OC.
See Section 2.b.

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

See Section 2.a

0.29 pound per hour and 1.28 tons per year of particulates;
1.10 pound per hour and 4.82 ton per year OC.

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

See Section 2.a

0.07 ton per year particulates;
0.25 ton per year OC.

20% opacity as a three-minute average

See Section 2.a

Rieter

PTI A

Emissions Unit ID: P033

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 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; and
- 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.

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PTI A

Emissions Unit ID: **P033**

Issued: To be entered upon final issuance

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 Section A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. 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 (total emissions -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)

Rieter

PTI A

Emissions Unit ID: **P033**

Issued: To be entered upon final issuance

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:
0.16 pound per hour of particulates (tool emissions-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:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:
Compliance with the 0.16 pound per hour limit constitutes compliance with the ton per year limit.
- e. Emission Limitation:
0.29 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:
1.28 tons per year of particulates (press emissions stack)

Applicable Compliance Method:
Compliance with the 0.29 pound per hour limit constitutes compliance with the ton per year limit.
- g. Emission Limitation:
0.07 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 per year limit.
- h. Emission Limitation:
0.49 pound per hour of organic compounds (OC) (tool emissions-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).
- i. Emission Limitation:
2.15 tons per year of OC (tool emissions-scrubber stack)

Rieter

PTI A

Emissions Unit ID: **P033**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the 0.49 pound per hour limit constitutes compliance with the ton per year limit.

Rieter

PTI A

Emissions Unit ID: **P033**

Issued: To be entered upon final issuance

- j. Emission Limitation:
1.10 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:
4.82 tons per year of OC (press emissions stack)
- Applicable Compliance Method:
Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.
- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)
- 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 and OAC rule 3745-21-10(C).
- 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:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P033) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

Rieter

PTI A

Emissions Unit ID: **P033**

Issued: To be entered upon final issuance

Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Rieter

PTI A

Emissions Unit ID: P033

Issued: To be entered upon final issuance

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14.99

MAGLC (ug/m³): 404.76

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (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 previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts

Rieter Automotive North America Inc
PTI A
Issued

Facility ID: 0448020035

Emissions Unit ID: **P033**

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Rieter

PTI A

Emissions Unit ID: **P033**

Issued: To be entered upon final issuance

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI A

Emissions Unit ID: P034

Issued: To be entered upon final issuance

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>	fugitive emissions	<u>Applicable Rules/Requirements</u>
P034 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 6 with 3 emission points:	facility HAP restriction	OAC rule 3745-31-05(A)(3)
tool emissions-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)

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PTI A

Emissions Unit ID: P034

Issued: To be entered upon final issuance

OAC rule 3745-31-05(A)(3)

See Section 2.c.

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)(3)

OAC rule 3745-31-05(C)

0.16 pound per hour and 0.69 ton per year of particulates;
0.49 pound per hour and 2.15 tons per year of OC.
See Section 2.b.

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

See Section 2.a

0.29 pound per hour and 1.28 tons per year of particulates;
1.10 pound per hour and 4.82 ton per year OC.

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

See Section 2.a

0.07 ton per year particulates;
0.25 ton per year OC.

20% opacity as a three-minute average

See Section 2.a

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2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 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; and
- 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.

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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 Section A.2.c.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1. 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 (tool emissions -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:
0.16 pound per hour of particulates (tool emissions-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:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

Compliance with the 0.16 pound per hour limit constitutes compliance with the ton per year limit.

- e. Emission Limitation:
0.29 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:
1.28 tons per year of particulates (press emissions stack)

Applicable Compliance Method:

Compliance with the 0.29 pound per hour limit constitutes compliance with the ton per year limit.

- g. Emission Limitation:
0.07 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 per year limit.

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PTI A

Emissions Unit ID: **P034**

Issued: To be entered upon final issuance

- h. Emission Limitation:
0.49 pound per hour of organic compounds (OC) (tool emissions-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).

- i. Emission Limitation:
2.15 tons per year of OC (tool emissions-scrubber stack)

Applicable Compliance Method:

Compliance with the 0.49 pound per hour limit constitutes compliance with the ton per year limit.

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PTI A

Emissions Unit ID: **P034**

Issued: To be entered upon final issuance

- j. Emission Limitation:
1.10 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:
4.82 tons per year of OC (press emissions stack)
- Applicable Compliance Method:
Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.
- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)
- 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 and OAC rule 3745-21-10(C).
- 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:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P034) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

Rieter

PTI A

Emissions Unit ID: **P034**

Issued: To be entered upon final issuance

Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ammonia

TLV (mg/m3): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.99

MAGLC (ug/m3): 404.76

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (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 previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

Rieter

PTI A

Emissions Unit ID: **P034**

Issued: To be entered upon final issuance

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Rieter

PTI A

Emissions Unit ID: **P034**

Issued: To be entered upon final issuance

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI A

Emissions Unit ID: P035

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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>	fugitive emissions	<u>Applicable Rules/Requirements</u>
P035 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 7 with 3 emission points:	facility HAP restriction	OAC rule 3745-31-05(A)(3)
tool emissions-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)

Rieter

PTI A

Emissions Unit ID: P035

Issued: To be entered upon final issuance

OAC rule 3745-31-05(A)(3)

See Section 2.c.

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)(3)

OAC rule 3745-31-05(C)

0.16 pound per hour and 0.69 ton per year of particulates;
0.49 pound per hour and 2.15 tons per year of OC.
See Section 2.b.

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

See Section 2.a

0.29 pound per hour and 1.28 tons per year of particulates;
1.10 pound per hour and 4.82 ton per year OC.

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

See Section 2.a

0.07 ton per year particulates;
0.25 ton per year OC.

20% opacity as a three-minute average

See Section 2.a

2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 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; and
- 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 Section A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. 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 (tool emissions -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:

Rieter

PTI A

Emissions Unit ID: **P035**

Issued: To be entered upon final issuance

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:
0.16 pound per hour of particulates (tool emissions-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:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

Compliance with the 0.16 pound per hour limit constitutes compliance with the ton per year limit.

- e. Emission Limitation:
0.29 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:
1.28 tons per year of particulates (press emissions stack)

Applicable Compliance Method:

Compliance with the 0.29 pound per hour limit constitutes compliance with the ton per year limit.

- g. Emission Limitation:
0.07 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 per year limit.

- h. Emission Limitation:

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PTI A

Emissions Unit ID: **P035**

Issued: To be entered upon final issuance

0.49 pound per hour of organic compounds (OC) (tool emissions-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).

- i. Emission Limitation:
2.15 tons per year of OC (tool emissions-scrubber stack)

Applicable Compliance Method:

Compliance with the 0.49 pound per hour limit constitutes compliance with the ton per year limit.

Rieter

PTI A

Emissions Unit ID: **P035**

Issued: To be entered upon final issuance

- j. Emission Limitation:
1.10 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:
4.82 tons per year of OC (press emissions stack)
- Applicable Compliance Method:
Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.
- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)
- 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 and OAC rule 3745-21-10(C).
- 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:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P035) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

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PTI A
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Facility ID: 0448020035

Emissions Unit ID: **P035**

Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Rieter

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P035

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14.99

MAGLC (ug/m³): 404.76

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (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 previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts

Rieter

PTI A

Emissions Unit ID: **P035**

Issued: To be entered upon final issuance

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Rieter

PTI A

Emissions Unit ID: **P035**

Issued: To be entered upon final issuance

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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>
P036 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 8 with 3 emission points:	facility HAP restriction
tool emissions-scrubber stack	OAC rule 3745-31-05(A)(3)
press emissions stack	OAC rule 3745-17-07(A)(1)
press emissions stack	OAC rule 3745-17-11(A)(2)
press emissions stack	OAC rule 3745-31-05(A)(3)
fugitive emissions	OAC rule 3745-17-07(A)(1)
fugitive emissions	OAC rule 3745-17-11(A)(2)
fugitive emissions	OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)(3)

OAC rule 3745-31-05(C)

Applicable Emissions
Limitations/Control Measures

0.16 pound per hour and 0.69 ton per year of particulates;
0.49 pound per hour and 2.15 tons per year of OC.
See Section 2.b.

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

See Section 2.a

0.29 pound per hour and 1.28 tons per year of particulates;
1.10 pound per hour and 4.82 ton per year OC.

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

See Section 2.a

0.07 ton per year particulates;
0.25 ton per year OC.

20% opacity as a three-minute average

See Section 2.a

See Section 2.c.

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2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 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.

Issued: To be entered upon final issuance

- 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; and
- 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 Section A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. 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 (tool emissions -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)

Rieter

PTI A

Emissions Unit ID: **P036**

Issued: To be entered upon final issuance

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:
0.16 pound per hour of particulates (tool emissions-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:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

Compliance with the 0.16 pound per hour limit constitutes compliance with the ton per year limit.

- e. Emission Limitation:
0.29 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:
1.28 tons per year of particulates (press emissions stack)

Applicable Compliance Method:

Compliance with the 0.29 pound per hour limit constitutes compliance with the ton per year limit.

- g. Emission Limitation:
0.07 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 per year limit.

- h. Emission Limitation:
0.49 pound per hour of organic compounds (OC) (tool emissions-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).

- i. Emission Limitation:
2.15 tons per year of OC (tool emissions-scrubber stack)

Applicable Compliance Method:

Compliance with the 0.49 pound per hour limit constitutes compliance with the ton per year limit.

Rieter

PTI A

Emissions Unit ID: P036

Issued: To be entered upon final issuance

- j. Emission Limitation:
1.10 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:
4.82 tons per year of OC (press emissions stack)
- Applicable Compliance Method:
Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.
- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)
- 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 and OAC rule 3745-21-10(C).
- 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:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P036) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

Rieter

PTI A

Emissions Unit ID: **P036**

Issued: To be entered upon final issuance

Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Rieter

PTI A

Emissions Unit ID: P036

Issued: To be entered upon final issuance

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14.99

MAGLC (ug/m³): 404.76

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (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 previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts

Rieter Automotive North America Inc
PTI A
Issued

Facility ID: 0448020035

Emissions Unit ID: **P036**

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Rieter

PTI A

Emissions Unit ID: **P036**

Issued: To be entered upon final issuance

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.