



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 04-01373**

**Fac ID: 0448020035**

**DATE: 10/28/2004**

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

TDES



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 10/28/2004  
Effective Date: 10/28/2004**

---

**FINAL PERMIT TO INSTALL 04-01373**

Application Number: 04-01373  
Facility ID: 0448020035  
Permit Fee: **\$2750**  
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):  
**Material handling operations and four presses for the manufacturer of automobile sound dampening insulation.**

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

**Rieter Automotive North America Inc**  
**PTI Application: 04-01373**  
**Issued: 10/28/2004**

**Facility ID: 0448020035**

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**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

6

**Rieter Automotive North America Inc**  
**PTI Application: 04-01373**  
**Issued: 10/28/2004**

**Facility ID: 0448020035**

Rieter Automotive North America Inc  
 PTI Application: 04-01373  
 Issued: 10/28/2004

Facility ID: 0448020035

#### 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>
PE	24.75
PM10	21.08
VOC	2.048
formaldehyde	1.572
ammonia	3.204

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
P037 - ECO+ Material Handling including mixer, controlled by a fabric filtration system; for the manufacturer of automobile sound dampening insulation	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 1.93 pounds per hour and 8.43 tons per year.</p> <p>Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 1.93 pounds per hour and 8.43 tons per year.</p> <p>Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average, from any stack or vent.</p>
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this applicable regulation is less stringent than the emission limitation established by OAC rule 3745-31-05.
	OAC rule 3745-17-11(A)(2)	The emission limitation specified by this applicable regulation is less stringent than the emission limitation established by OAC rule 3745-31-05.

**2. Additional Terms and Conditions**

- 2.a None

## **B. Operational Restrictions**

1. All of the equipment comprising the ECO+ material handling operations shall be contained within the building enclosure.

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

## **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible fugitive emissions were observed from any stack or vent from the room containing this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

The quarterly reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31 and October 31 of each year.

## **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:

Visible particulate emissions not to exceed 5 percent opacity, as a 6-minute average, from any stack or vent.

Applicable Compliance Method:

Compliance shall be demonstrated through the daily visible emission checks, per Section C.1 and if required, visible particulate emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

1.93 pounds of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate USEPA approved test methods may be used with prior written approval.

c. Emission Limitation:

8.43 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (1.93 pounds of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

1.93 pounds of PM<sub>10</sub> per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate USEPA approved test methods may be used with prior

**Rieter Automotive North America Inc**  
**PTI Application: 04-01373**  
**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P037**

written approval.

- e. Emission Limitation:  
8.43 tons of PM<sub>10</sub> per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PM<sub>10</sub> emission limitation (1.93 pounds of PM<sub>10</sub> per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements.
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
  - b. The emission testing shall be conducted to demonstrate compliance with the PE and PM<sub>10</sub> emissions limitations from the stack serving the fabric filtration system.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A
    - ii. for PM<sub>10</sub>: a determination of the backhalf collection from Method 5, for the condensables, shall be required as an estimate of PM<sub>10</sub>.

Alternate USEPA approved test methods may be used with prior written approval.

- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the TDOES refusal to accept the results of the emission test(s).

Personnel from the TDOES shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the

13

**Rieter**

**PTI A**

**Issued: 10/28/2004**

Emissions Unit ID: **P037**

emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

**Rieter Automotive North America Inc**

**PTI Application: 04 01272**

**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P037**

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the TDOES.

**F. Miscellaneous Requirements**

None

**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>	OAC rule 3745-21-07(B)
P038 - ECO+ press #1 and Cooling Bucks; for the manufacturer of automobile sound dampening insulation	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	

Applicable Emissions  
Limitations/Control Measures

Ammonia emissions shall not exceed 0.183 pound per hour and 0.801 ton per year.

Formaldehyde emissions shall not exceed 0.090 pound per hour and 0.393 ton per year.

Particulate emissions (PE) shall not exceed 0.931 pound per hour and 4.079 tons per year.

Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 0.722 pound per hour and 3.162 tons per year.

Volatile organic compound emissions (VOC) shall not exceed 0.117 pound per hour and 0.512 ton per year.

See section II.A.2.a.

See section II.A.2.b.

See section II.A.2.b.

See section II.A.2.c

**2. Additional Terms and Conditions**

- 2.a** Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average, from any stack or vent.
- 2.b** The emission limitation specified by this applicable regulation is less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.c** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The pound per hour and ton per year emission limitations were established for permitting purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation. This emissions unit has been permitted at its maximum capacity of 1,600 pounds of material (sound dampening insulation) per hour, using emission factors from previous testing results, adjusted by a conservative safety factor. The emission factors applied are as follows:
  - 5.82 E-04 pound PE/pound of material processed
  - 4.51 E-04 pound PM<sub>10</sub>/pound of material processed
  - 7.31 E-05 pound OC/pound of material processed
  - 5.60 E-05 pound of formaldehyde/pound of material processed
  - 1.14 E-04 pound of ammonia/pound of material processed

**B. Operational Restrictions**

- 1. All of the equipment comprising the press and cooling buck operations shall be contained within the building enclosure.

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

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

2. The permit to install for this emissions unit was evaluated based on the actual 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 Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

TLV (mg/m<sup>3</sup>): 0.27 (STEL/ceiling x 0.737)

Maximum Hourly Emission Rate (lbs/hr): 0.36  
(for four identical units P038 through P041 @ 0.090 lb/hr each)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 6.13 µg/m<sup>3</sup>  
(modeled using a stack height of 56 feet)

MAGLC (ug/m<sup>3</sup>): 6.49 µg/m<sup>3</sup>

3. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible fugitive emissions were observed from any stack or vent from the room containing this emissions unit and (b) describe any corrective actions taken to minimize or

eliminate the visible fugitive particulate emissions.

2. These quarterly reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31 and October 31 of each year.

**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:

Visible particulate emissions not to exceed 5 percent opacity, as a 6-minute average, from any stack or vent.

Applicable Compliance Method:

Compliance shall be demonstrated through the daily visible emission checks, per Section C.1 and if required, visible particulate emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

0.931 pound of PE per hour

Applicable Compliance Method:

An emission factor of 5.82 E-04 pound of PE/pound of material processed shall be used to demonstrate compliance until a revised emission factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate USEPA approved test methods may be used with prior written approval.

c. Emission Limitation:

4.079 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.931 pound of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

0.722 pound of PM<sub>10</sub> per hour

Applicable Compliance Method:

An emission factor of 4.51 E-04 pound of PM<sub>10</sub>/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate USEPA approved test methods may be used with prior written approval.

e. Emission Limitation:

3.162 tons of PM<sub>10</sub> per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PM<sub>10</sub> emission limitation (0.722 pound of PM<sub>10</sub> per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

0.117 pound of VOC per hour

Applicable Compliance Method:

An emission factor of 7.31 E-05 pound of OC/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-21-10(C). Alternate USEPA approved test methods may be used with prior written approval.

g. Emission Limitation:

0.512 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the VOC emission limitation (0.117 pound of VOC per hour) by the maximum annual hours of operation (8760 hrs), and then

dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

0.183 pound of ammonia per hour

Applicable Compliance Method:

An emission factor of 1.14 E-04 pound of ammonia/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with CTM-027. Alternate USEPA approved test methods may be used with prior written approval.

i. Emission Limitation:

0.801 ton of ammonia per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the ammonia emission limitation (0.183 pound of ammonia per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

0.090 pound of formaldehyde per hour

Applicable Compliance Method:

An emission factor of 5.60 E-05 pound of formaldehyde/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 316 of 40 CFR Part 63, Appendix A. Alternate USEPA approved test methods may be used with prior written approval.

k. Emission Limitation:

0.393 ton of formaldehyde per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the formaldehyde emission limitation (0.090 pound of formaldehyde per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is

shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for the first of the presses (P038 through P041) that become operational, in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
  - b. The emission testing shall be conducted to demonstrate compliance with the PE, PM<sub>10</sub>, and formaldehyde emissions limitations from the stack serving the emissions unit.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for PE: Methods 1 through 5 of 40 CFR Part 60 Appendix A.
    - ii. for PM<sub>10</sub>: a determination of the backhalf collection from Method 5, for the condensables, shall be required as an estimate of PM<sub>10</sub>.
    - iii. for formaldehyde: Method 316 of 40 CFR Part 63, Appendix A.

Alternate USEPA approved test methods may be used with prior written approval.

- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control.
- e. In order to demonstrate compliance with the Air Toxic Policy and due to the variation of the formaldehyde content in the raw materials to be applied, the permittee shall establish a monitoring program for formaldehyde, which may include air sampling, raw material lab analysis, or any other acceptable method to measure the content, potential emissions, or actual emissions of formaldehyde from this emissions unit. During the stack test (Method 316) the permittee shall measure or sample the same parameter(s) or materials, using the same method(s), that will be used in the monitoring program, in order to correlate the stack testing results with results obtained from the monitoring plan. The monitoring plan shall require that a sufficient number of samples are taken, over a adequate period of time, to assure that the raw materials have been adequately represented in the monitoring for its differences. A written summary report, including the sampling method, the dates sampled, the Method used to measure the formaldehyde content or emissions, and the testing results shall be submitted to TDOES not later than one year after the initial startup of the

production line.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the TDOES refusal to accept the results of the emission test(s).

Personnel from the TDOES shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the TDOES.

#### **F. Miscellaneous Requirements**

None

**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>	OAC rule 3745-21-07(B)
P039 - ECO+ Press #2 and Cooling Bucks; for the manufacturer of automobile sound dampening insulation	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	

Applicable Emissions  
Limitations/Control Measures

Ammonia emissions shall not exceed 0.183 pound per hour and 0.801 ton per year.

Formaldehyde emissions shall not exceed 0.090 pound per hour and 0.393 ton per year.

Particulate emissions (PE) shall not exceed 0.931 pound per hour and 4.079 tons per year.

Particulate emissions less than 10 microns in diameter ( $PM_{10}$ ) shall not exceed 0.722 pound per hour and 3.162 tons per year.

Volatile organic compound emissions (VOC) shall not exceed 0.117 pound per hour and 0.512 ton per year.

See section II.A.2.a.

See section II.A.2.b.

See section II.A.2.b.

See section II.A.2.c.

## 2. Additional Terms and Conditions

- 2.a Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average, from any stack or vent.
- 2.b The emission limitation specified by this applicable regulation is less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d The pound per hour and ton per year emission limitations were established for permitting purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation. This emissions unit has been permitted at its maximum capacity of 1,600 pounds of material (sound dampening insulation) per hour, using emission factors from previous testing results, adjusted by a conservative safety factor. The emission factors applied are as follows:
  - 5.82 E-04 pound PE/pound of material processed
  - 4.51 E-04 pound PM<sub>10</sub>/pound of material processed
  - 7.31 E-05 pound OC/pound of material processed
  - 5.60 E-05 pound of formaldehyde/pound of material processed
  - 1.14 E-04 pound of ammonia/pound of material processed

## B. Operational Restrictions

- 1. All of the equipment comprising the press and cooling buck operations shall be contained within the building enclosure.

## C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;

Emissions Unit ID: P039

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

2. The permit to install for this emissions unit was evaluated based on the actual 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 Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

TLV (mg/m<sup>3</sup>): 0.27 (STEL/ceiling x 0.737)

Maximum Hourly Emission Rate (lbs/hr): 0.36  
(for four identical units P038 through P041 @ 0.090 lb/hr each)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 6.13 ug/m<sup>3</sup>  
(modeled using a stack height of 56 feet)

MAGLC (ug/m<sup>3</sup>): 6.49 ug/m<sup>3</sup>

3. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible fugitive emissions were observed from any stack or vent from the room containing this emissions unit and (b) describe any corrective actions taken to minimize or

**Rieter Automotive North America Inc**

**PTI Application: 04 01272**

**Issued**

**Facility ID: 0448020035**

**Emissions Unit ID: P039**

eliminate the visible fugitive particulate emissions.

2. These quarterly reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31 and October 31 of each year.

**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:

Visible particulate emissions not to exceed 5 percent opacity, as a 6-minute average, from any stack or vent.

Applicable Compliance Method:

Compliance shall be demonstrated through the daily visible emission checks, per Section C.1 and if required, visible particulate emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

0.931 pound of PE per hour

Applicable Compliance Method:

An emission factor of 5.82 E-04 pound of PE/pound of material processed shall be used to demonstrate compliance until a revised emission factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate USEPA approved test methods may be used with prior written approval.

c. Emission Limitation:

4.079 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.931 pound of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

0.722 pound of PM<sub>10</sub> per hour

Applicable Compliance Method:

An emission factor of 4.51 E-04 pound of PM<sub>10</sub>/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate USEPA approved test methods may be used with prior written approval.

e. Emission Limitation:

3.162 tons of PM<sub>10</sub> per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PM<sub>10</sub> emission limitation (0.722 pound of PM<sub>10</sub> per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

0.117 pound of VOC per hour

Applicable Compliance Method:

An emission factor of 7.31 E-05 pound of OC/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-21-10(C). Alternate USEPA approved test methods may be used with prior written approval.

g. Emission Limitation:

0.512 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the VOC emission limitation (0.117 pound of VOC per hour) by the maximum annual hours of operation (8760 hrs), and then

**Rieter Automotive North America Inc**

**PTI Application: 04-01272**

**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P039**

dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

0.183 pound of ammonia per hour

Applicable Compliance Method:

An emission factor of 1.14 E-04 pound of ammonia/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with CTM-027. Alternate USEPA approved test methods may be used with prior written approval.

i. Emission Limitation:

0.801 ton of ammonia per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the ammonia emission limitation (0.183 pound of ammonia per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

0.090 pound of formaldehyde per hour

Applicable Compliance Method:

An emission factor of 5.60 E-05 pound of formaldehyde/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 316 of 40 CFR Part 63, Appendix A. Alternate USEPA approved test methods may be used with prior written approval.

k. Emission Limitation:

0.393 ton of formaldehyde per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the formaldehyde emission limitation (0.090 pound of formaldehyde per hour) by the maximum annual hours of

operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for the first of the presses (P038 through P041) that become operational, in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
  - b. The emission testing shall be conducted to demonstrate compliance with the PE, PM<sub>10</sub>, and formaldehyde emissions limitations from the stack serving the emissions unit.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for PE: Methods 1 through 5 of 40 CFR Part 60 Appendix A.
    - ii. for PM<sub>10</sub>: a determination of the backhalf collection from Method 5, for the condensables, shall be required as an estimate of PM<sub>10</sub>.
    - iii. for formaldehyde: Method 316 of 40 CFR Part 63, Appendix A.

Alternate USEPA approved test methods may be used with prior written approval.

- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control.
- e. In order to demonstrate compliance with the Air Toxic Policy and due to the variation of the formaldehyde content in the raw materials to be applied, the permittee shall establish a monitoring program for formaldehyde, which may include air sampling, raw material lab analysis, or any other acceptable method to measure the content, potential emissions, or actual emissions of formaldehyde from this emissions unit. During the stack test (Method 316) the permittee shall measure or sample the same parameter(s) or materials, using the same method(s), that will be used in the monitoring program, in order to correlate the stack testing results with results obtained from the monitoring plan. The monitoring plan shall require that a sufficient number of samples are taken, over a adequate period of time, to assure that the raw materials have been adequately represented in the monitoring for its differences. A written summary report, including the sampling method, the dates sampled,

the Method used to measure the formaldehyde content or emissions, and the testing results shall be submitted to TDOES not later than one year after the initial startup of the production line.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the TDOES refusal to accept the results of the emission test(s).

Personnel from the TDOES shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the TDOES.

#### **F. Miscellaneous Requirements**

None

## 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>	OAC rule 3745-21-07(B)
P040 - ECO+ press #3 and Cooling Bucks; for the manufacturer of automobile sound dampening insulation	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	

Applicable Emissions  
Limitations/Control Measures

Ammonia emissions shall not exceed 0.183 pound per hour and 0.801 ton per year.

Formaldehyde emissions shall not exceed 0.090 pound per hour and 0.393 ton per year.

Particulate emissions (PE) shall not exceed 0.931 pound per hour and 4.079 tons per year.

Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 0.722 pound per hour and 3.162 tons per year.

Volatile organic compound emissions (VOC) shall not exceed 0.117 pound per hour and 0.512 ton per year.

See section II.A.2.a.

See section II.A.2.b.

See section II.A.2.b.

See section II.A.2.c.

## 2. Additional Terms and Conditions

- 2.a Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average, from any stack or vent.
- 2.b The emission limitation specified by this applicable regulation is less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d The pound per hour and ton per year emission limitations were established for permitting purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation. This emissions unit has been permitted at its maximum capacity of 1,600 pounds of material (sound dampening insulation) per hour, using emission factors from previous testing results, adjusted by a conservative safety factor. The emission factors applied are as follows:
  - 5.82 E-04 pound PE/pound of material processed
  - 4.51 E-04 pound PM<sub>10</sub>/pound of material processed
  - 7.31 E-05 pound OC/pound of material processed
  - 5.60 E-05 pound of formaldehyde/pound of material processed
  - 1.14 E-04 pound of ammonia/pound of material processed

## B. Operational Restrictions

- 1. All of the equipment comprising the press and cooling buck operations shall be contained within the building enclosure.

## C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

2. The permit to install for this emissions unit was evaluated based on the actual 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 Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

TLV (mg/m<sup>3</sup>): 0.27 (STEL/ceiling x 0.737)

Maximum Hourly Emission Rate (lbs/hr): 0.36  
 (for four identical units P038 through P041 @ 0.090 lb/hr each)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 6.13 ug/m<sup>3</sup>  
 (modeled using a stack height of 56 feet)

MAGLC (ug/m<sup>3</sup>): 6.49 ug/m<sup>3</sup>

3. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible fugitive emissions were observed from any stack or vent from the room containing this emissions unit and (b) describe any corrective actions taken to minimize or

**Rieter Automotive North America Inc**  
**PTI Application: 04 01272**  
**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P040**

eliminate the visible fugitive particulate emissions.

2. These quarterly reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31 and October 31 of each year.

**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:

Visible particulate emissions not to exceed 5 percent opacity, as a 6-minute average, from any stack or vent.

Applicable Compliance Method:

Compliance shall be demonstrated through the daily visible emission checks, per Section C.1 and if required, visible particulate emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

0.931 pound of PE per hour

Applicable Compliance Method:

An emission factor of 5.82 E-04 pound of PE/pound of material processed shall be used to demonstrate compliance until a revised emission factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate USEPA approved test methods may be used with prior written approval.

c. Emission Limitation:

4.079 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.931 pound of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

0.722 pound of PM<sub>10</sub> per hour

Applicable Compliance Method:

An emission factor of 4.51 E-04 pound of PM<sub>10</sub>/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate USEPA approved test methods may be used with prior written approval.

e. Emission Limitation:

3.162 tons of PM<sub>10</sub> per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PM<sub>10</sub> emission limitation (0.722 pound of PM<sub>10</sub> per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

0.117 pound of VOC per hour

Applicable Compliance Method:

An emission factor of 7.31 E-05 pound of OC/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-21-10(C). Alternate USEPA approved test methods may be used with prior written approval.

g. Emission Limitation:

0.512 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the VOC emission limitation (0.117 pound of VOC per hour) by the maximum annual hours of operation (8760 hrs), and then

**Rieter Automotive North America Inc**

**PTI Application: 04-01272**

**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P040**

dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

0.183 pound of ammonia per hour

Applicable Compliance Method:

An emission factor of 1.14 E-04 pound of ammonia/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with CTM-027. Alternate USEPA approved test methods may be used with prior written approval.

i. Emission Limitation:

0.801 ton of ammonia per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the ammonia emission limitation (0.183 pound of ammonia per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

0.090 pound of formaldehyde per hour

Applicable Compliance Method:

An emission factor of 5.60 E-05 pound of formaldehyde/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 316 of 40 CFR Part 63, Appendix A. Alternate USEPA approved test methods may be used with prior written approval.

k. Emission Limitation:

0.393 ton of formaldehyde per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the formaldehyde emission limitation (0.090 pound of formaldehyde per hour) by the maximum annual hours of

operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for the first of the presses (P038 through P041) that become operational, in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
  - b. The emission testing shall be conducted to demonstrate compliance with the PE, PM<sub>10</sub>, and formaldehyde emissions limitations from the stack serving the emissions unit.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for PE: Methods 1 through 5 of 40 CFR Part 60 Appendix A.
    - ii. for PM<sub>10</sub>: a determination of the backhalf collection from Method 5, for the condensables, shall be required as an estimate of PM<sub>10</sub>
    - iii. for formaldehyde: Method 316 of 40 CFR Part 63, Appendix A.

Alternate USEPA approved test methods may be used with prior written approval.

- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control.
- e. In order to demonstrate compliance with the Air Toxic Policy and due to the variation of the formaldehyde content in the raw materials to be applied, the permittee shall establish a monitoring program for formaldehyde, which may include air sampling, raw material lab analysis, or any other acceptable method to measure the content, potential emissions, or actual emissions of formaldehyde from this emissions unit. During the stack test (Method 316) the permittee shall measure or sample the same parameter(s) or materials, using the same method(s), that will be used in the monitoring program, in order to correlate the stack testing results with results obtained from the monitoring plan. The monitoring plan shall require that a sufficient number of samples are taken, over a adequate period of time, to assure that the raw materials have been adequately represented in the monitoring for its differences. A written summary report, including the sampling method, the dates sampled,

the Method used to measure the formaldehyde content or emissions, and the testing results shall be submitted to TDOES not later than one year after the initial startup of the production line.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the TDOES refusal to accept the results of the emission test(s).

Personnel from the TDOES shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the TDOES.

#### **F. Miscellaneous Requirements**

None

**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>	OAC rule 3745-21-07(B)
P041 - ECO+ press #4 and Cooling Bucks; for the manufacturer of automobile sound dampening insulation	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	

Applicable Emissions  
Limitations/Control Measures

Ammonia emissions shall not exceed 0.183 pound per hour and 0.801 ton per year.

Formaldehyde emissions shall not exceed 0.090 pound per hour and 0.393 ton per year.

Particulate emissions (PE) shall not exceed 0.931 pound per hour and 4.079 tons per year.

Particulate emissions less than 10 microns in diameter ( $PM_{10}$ ) shall not exceed 0.722 pound per hour and 3.162 tons per year.

Volatile organic compound emissions (VOC) shall not exceed 0.117 pound per hour and 0.512 ton per year.

See section II.A.2.a.

See section II.A.2.b.

See section II.A.2.b.

See section II.A.2.c

**2. Additional Terms and Conditions**

- 2.a** Visible particulate emissions shall not exceed 5 percent opacity, as a 6-minute average, from any stack or vent.
- 2.b** The emission limitation specified by this applicable regulation is less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.c** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The pound per hour and ton per year emission limitations were established for permitting purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation. This emissions unit has been permitted at its maximum capacity of 1,600 pounds of material (sound dampening insulation) per hour, using emission factors from previous testing results, adjusted by a conservative safety factor. The emission factors applied are as follows:
  - 5.82 E-04 pound PE/pound of material processed
  - 4.51 E-04 pound PM<sub>10</sub>/pound of material processed
  - 7.31 E-05 pound OC/pound of material processed
  - 5.60 E-05 pound of formaldehyde/pound of material processed
  - 1.14 E-04 pound of ammonia/pound of material processed

**B. Operational Restrictions**

- 1. All of the equipment comprising the press and cooling buck operations shall be contained within the building enclosure.

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

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;

Emissions Unit ID: **P041**

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

2. The permit to install for this emissions unit was evaluated based on the actual 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 Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

TLV (mg/m<sup>3</sup>): 0.27 (STEL/ceiling x 0.737)

Maximum Hourly Emission Rate (lbs/hr): 0.36  
 (for four identical units P038 through P041 @ 0.090 lb/hr each)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 6.13 ug/m<sup>3</sup>  
 (modeled using a stack height of 56 feet)

MAGLC (ug/m<sup>3</sup>): 6.49 ug/m<sup>3</sup>

3. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible fugitive emissions were observed from any stack or vent from the room containing this emissions unit and (b) describe any corrective actions taken to minimize or

**Rieter Automotive North America Inc**

**PTI Application: 04 01272**

**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P041**

eliminate the visible fugitive particulate emissions.

2. These quarterly reports shall be submitted to the Toledo Division of Environmental Services by January 31, April 30, July 31 and October 31 of each year.

**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:

Visible particulate emissions not to exceed 5 percent opacity, as a 6-minute average, from any stack or vent.

Applicable Compliance Method:

Compliance shall be demonstrated through the daily visible emission checks, per Section C.1 and if required, visible particulate emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

0.931 pound of PE per hour

Applicable Compliance Method:

An emission factor of 5.82 E-04 pound of PE/pound of material processed shall be used to demonstrate compliance until a revised emission factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate USEPA approved test methods may be used with prior written approval.

c. Emission Limitation:

4.079 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.931 pound of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation:

0.722 pound of PM<sub>10</sub> per hour

Applicable Compliance Method:

An emission factor of 4.51 E-04 pound of PM<sub>10</sub>/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate USEPA approved test methods may be used with prior written approval.

e. Emission Limitation:

3.162 tons of PM<sub>10</sub> per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PM<sub>10</sub> emission limitation (0.722 pound of PM<sub>10</sub> per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

0.117 pound of VOC per hour

Applicable Compliance Method:

An emission factor of 7.31 E-05 pound of OC/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A, using the methods and procedures specified in OAC rule 3745-21-10(C). Alternate USEPA approved test methods may be used with prior written approval.

g. Emission Limitation:

0.512 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the VOC emission limitation (0.117 pound of VOC per hour) by the maximum annual hours of operation (8760 hrs), and then

**Rieter Automotive North America Inc**

**PTI Application: 04-01272**

**Issued**

**Facility ID: 0448020035**

Emissions Unit ID: **P041**

dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

0.183 pound of ammonia per hour

Applicable Compliance Method:

An emission factor of 1.14 E-04 pound of ammonia/pound of material processed, developed from previous testing results, shall be used to demonstrate compliance. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with CTM-027. Alternate USEPA approved test methods may be used with prior written approval.

i. Emission Limitation:

0.801 ton of ammonia per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the ammonia emission limitation (0.183 pound of ammonia per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

0.090 pound of formaldehyde per hour

Applicable Compliance Method:

An emission factor of 5.60 E-05 pound of formaldehyde/pound of material processed shall be used to demonstrate compliance until a revised emissions factor is documented through testing. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 316 of 40 CFR Part 63, Appendix A. Alternate USEPA approved test methods may be used with prior written approval.

k. Emission Limitation:

0.393 ton of formaldehyde per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the formaldehyde emission limitation (0.090 pound of formaldehyde per hour) by the maximum annual hours of

operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct, or have conducted, emission testing for the first of the presses (P038 through P041) that become operational, in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
  - b. The emission testing shall be conducted to demonstrate compliance with the PE, PM<sub>10</sub>, and formaldehyde emissions limitations from the stack serving the emissions unit.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for PE: Methods 1 through 5 of 40 CFR Part 60 Appendix A.
    - ii. for PM<sub>10</sub>: a determination of the backhalf collection from Method 5, for the condensables, shall be required as an estimate of PM<sub>10</sub>.
    - iii. for formaldehyde: Method 316 of 40 CFR Part 63, Appendix A.

Alternate USEPA approved test methods may be used with prior written approval.

- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control.
- e. In order to demonstrate compliance with the Air Toxic Policy and due to the variation of the formaldehyde content in the raw materials to be applied, the permittee shall establish a monitoring program for formaldehyde, which may include air sampling, raw material lab analysis, or any other acceptable method to measure the content, potential emissions, or actual emissions of formaldehyde from this emissions unit. During the stack test (Method 316) the permittee shall measure or sample the same parameter(s) or materials, using the same method(s), that will be used in the monitoring program, in order to correlate the stack testing results with results obtained from the monitoring plan. The monitoring plan shall require that a sufficient number of samples are taken, over a adequate period of time, to assure that the raw materials have been adequately represented in the monitoring for its differences. A written summary report, including the sampling method, the dates sampled,

the Method used to measure the formaldehyde content or emissions, and the testing results shall be submitted to TDOES not later than one year after the initial startup of the production line.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the TDOES refusal to accept the results of the emission test(s).

Personnel from the TDOES shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the TDOES.

#### **F. Miscellaneous Requirements**

None