



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
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: 04-01353

Fac ID: 0448020035

DATE: 2/3/2005

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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: 2/3/2005
Effective Date: 2/3/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 04-01353

Application Number: 04-01353
Facility ID: 0448020035
Permit Fee: **\$0**
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):
Modification to add Federal Enforceability for HAPs.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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: 04-01353
Modification Issued: 2/3/2005

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

Rieter Automotive North America Inc

PTI Application: 04-01353

Modification Issued: 2/3/2005

Facility ID: 0448020035

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.

Rieter Automotive North America Inc
 PTI Application: 04-01353
 Modification Issued: 2/3/2005

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>
OC	28.90
PE	8.14
Formaldehyde	0.92
Phenol	0.40

OAC rule 3745-17-07(A)(1)	Applicable Emissions <u>Limitations/Control Measures</u>	average
OAC rule 3745-17-11(A)(2)	0.16 pound per hour and 0.69 ton per year of particulates; 0.49 pound per hour and 2.15 tons per year of OC;	See Section 2.a
OAC rule 3745-31-05(A)(3)	0.05 pound per hour and 0.22 ton per year of formaldehyde; and 0.02 pound per hour and 0.09 ton per year of phenol	See Section 2.c
OAC rule 3745-17-07(B)(1)	See Section 2.b and 2.d	
OAC rule 3745-17-08(B)(3)	20% opacity as a six-minute average, unless otherwise specified by the rule	
OAC rule 3745-31-05(C)	See Section 2.a	
	0.29 pound per hour and 1.28 tons per year of particulates; 1.10 pounds per hour and 4.82 tons per year OC; 0.01 pound per hour and 0.05 ton per year of formaldehyde; and 0.01 pound per hour and 0.05 ton per year of phenol	
	See section 2.d	
	20% opacity as a six-minute average, unless otherwise specified by the rule	
	See Section 2.a	
	0.07 ton per year particulates; and 0.25 ton per year OC	
	20% opacity as a three-minute	

Modification Issued: 2/3/2005

2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.
- 2.d** The hourly and annual emission HAPs limitations were established by a one-time worst case HAP emissions calculation for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. Scrubber No. 1 Operational Restrictions

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

2. Scrubber No. 2 Operational Restrictions

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

- a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.

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

C. Monitoring and/or Recordkeeping Requirements

1. Scrubber Monitoring Requirements

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

2. Scrubber Recordkeeping Requirements

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

- a. the pressure drop across the scrubber, in inches of water, once per shift;
- b. the scrubber water flow rate, in gallons per minute, once per shift;
- c. the pH of the scrubber liquor on an hourly basis;
- d. the oxidation-reduction potential of the scrubber liquor on an hourly basis; and
- e. a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain records of the facility's potential to emit for each individual hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

D. Reporting Requirements

1. Scrubber Reporting Requirements

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

2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
20% opacity as a six-minute average (total emissions -scrubber stack and press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

20% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

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

- c. Emission Limitation:
0.16 pound per hour of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- d. Emission Limitation:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- e. Emission Limitation:
0.29 pound per hour of particulates (press emissions stack)

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- g. Emission Limitation:
0.07 tons per year of particulates (fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 20% opacity as a 3-minute average

constitutes compliance with the ton per year limit.

- h. Emission Limitation:
0.49 pound per hour of organic compounds (OC) (tool emissions-scrubber stack)
- Applicable Compliance Method:
Compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).
- i. Emission Limitation:
2.15 tons per year of OC (tool emissions-scrubber stack)
- Applicable Compliance Method:
Compliance with the 0.49 pound per hour limit constitutes compliance with the ton per year limit.
- j. Emission Limitation:
1.10 pound per hour of organic compounds (OC) (press emissions stack)
- Applicable Compliance Method:
If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-21-10(C).
- k. Emission Limitation:
4.82 tons per year of OC (press emissions stack)
- Applicable Compliance Method:
Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.
- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)
- Applicable Compliance Method:
If required, the permittee shall determine a fugitive emission factor by conducting performance testing according to Method 204 of 40 CFR Part 60, Appendix A and OAC rule 3745-21-10(C).
- m. Emission Limitation:
Potential emissions from this facility shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

15

Rieter

PTI A

Modification Issued: 2/3/2005

Emissions Unit ID: **P033**

Applicable Compliance Method:

The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

Modification Issued: 2/3/2005

- n. Emission Limitation:
- 0.05 pound per hour of formaldehyde (scrubber stack emissions)
- Applicable Compliance Method:
- If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.
- o. Emission Limitation:
- 0.22 ton per year of formaldehyde (scrubber stack emissions)
- Applicable Compliance Method:
- This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.05 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.
- Emission Limitation:
- p. 0.02 pound per hour of phenol (scrubber stack emissions)
- Applicable Compliance Method:
- If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.
- q. Emission Limitation:
- 0.09 ton per year of phenol (scrubber stack emissions)
- Applicable Compliance Method:
- This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.02 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown

17

Rieter

PTI A

Modification Issued: 2/3/2005

Emissions Unit ID: **P033**

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

Modification Issued: 2/3/2005

- r. Emission Limitation:
- 0.01 pound per hour of formaldehyde (press emissions)
- Applicable Compliance Method:
- If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.
- s. Emission Limitation:
- 0.05 ton per year of formaldehyde (press emissions)
- Applicable Compliance Method:
- This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.
- Emission Limitation:
- t. 0.01 pound per hour of phenol (press emissions)
- Applicable Compliance Method:
- If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.
- u. Emission Limitation:
- 0.05 ton per year of phenol (press emissions)
- Applicable Compliance Method:
- This emission limitatoin was developed by multiplying the allowable phenol emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown

Rieter Automotive North America Inc

PTI Application: 04 01353

Modif

Facility ID: 0448020035

Emissions Unit ID: **P033**

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit to install are federally enforceable.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the combined emissions from emissions units P033, P034, P035 and P036 for each pollutant:

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

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

MAGLC (ug/m³): 404.76

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 still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

Modification Issued: 2/3/2005

- 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. 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.

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>
P034 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 5 with 3 emission points: tool emissions controlled by a wet scrubber	OAC rule 3745-31-05(A)(3)
fugitive emissions	OAC rule 3745-17-07(A)(1)
facility HAP restriction	OAC rule 3745-17-11(A)(2)
press emissions stack with no control	OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)(1)	<u>Applicable Emissions Limitations/Control Measures</u>	0.07 ton per year particulates; and 0.25 ton per year OC
OAC rule 3745-17-11(A)(2)	0.16 pound per hour and 0.69 ton per year of particulates; 0.49 pound per hour and 2.15 tons per year of OC;	20% opacity as a three-minute average
OAC rule 3745-31-05(A)(3)	0.05 pound per hour and 0.22 ton per year of formaldehyde; and 0.02 pound per hour and 0.09 ton per year of phenol	See Section 2.a
OAC rule 3745-17-07(B)(1)	See Section 2.b and 2.d	See Section 2.c
OAC rule 3745-17-08(B)(3)	20% opacity as a six-minute average, unless otherwise specified by the rule	
OAC rule 3745-31-05(C)	See Section 2.a	
	0.29 pound per hour and 1.28 tons per year of particulates; 1.10 pounds per hour and 4.82 tons per year OC; 0.01 pound per hour and 0.05 ton per year of formaldehyde; and 0.01 pound per hour and 0.05 ton per year of phenol	
	See section 2.d	
	20% opacity as a six-minute average, unless otherwise specified by the rule	
	See Section 2.a	

Modification Issued: 2/3/2005

2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.
- 2.d** The hourly and annual emission HAPs limitations were established by a one-time worst case HAP emissions calculation for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. Scrubber No. 1 Operational Restrictions

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

2. Scrubber No. 2 Operational Restrictions

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

- a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.

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

C. Monitoring and/or Recordkeeping Requirements

1. Scrubber Monitoring Requirements

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

2. Scrubber Recordkeeping Requirements

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

- a. the pressure drop across the scrubber, in inches of water, once per shift;
- b. the scrubber water flow rate, in gallons per minute, once per shift;
- c. the pH of the scrubber liquor on an hourly basis;
- d. the oxidation-reduction potential of the scrubber liquor on an hourly basis; and
- e. a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain records of the facility's potential to emit for each individual

hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

D. Reporting Requirements

1. Scrubber Reporting Requirements

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

2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
20% opacity as a six-minute average (total emissions -scrubber stack and press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
20% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

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

- c. Emission Limitation:
0.16 pound per hour of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- d. Emission Limitation:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- e. Emission Limitation:
0.29 pound per hour of particulates (press emissions stack)

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

Rieter Automotive North America Inc

PTI Application: 04-01353

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Facility ID: 0448020035

Emissions Unit ID: P034

- g. Emission Limitation:
0.07 tons per year of particulates (fugitive emissions)

Modification Issued: 2/3/2005

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- j. Emission Limitation:
1.10 pound per hour of organic compounds (OC) (press emissions stack)

Applicable Compliance Method:

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

- k. Emission Limitation:
4.82 tons per year of OC (press emissions stack)

Applicable Compliance Method:

Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.

- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)

Applicable Compliance Method:

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

Modification Issued: 2/3/2005

rule 3745-21-10(C).

- m. Emission Limitation:
Potential emissions from this facility shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

Applicable Compliance Method:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

- n. Emission Limitation:

0.05 pound per hour of formaldehyde (scrubber stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

- o. Emission Limitation:

0.22 ton per year of formaldehyde (scrubber stack emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.05 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

Emission Limitation:

- p. 0.02 pound per hour of phenol (scrubber stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

q. Emission Limitation:

0.09 ton per year of phenol (scrubber stack emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.02 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

r. Emission Limitation:

0.01 pound per hour of formaldehyde (press emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

s. Emission Limitation:

0.05 ton per year of formaldehyde (press emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

Emission Limitation:

t. 0.01 pound per hour of phenol (press emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in

accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

u. Emission Limitation:

0.05 ton per year of phenol (press emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit to install are federally enforceable.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the combined emissions from emissions units P033, P034, P035 and P036 for each pollutant:

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

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

MAGLC (ug/m³): 404.76

Modification Issued: 2/3/2005

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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. 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.

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>
P035 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 5 with 3 emission points: tool emissions controlled by a wet scrubber	OAC rule 3745-31-05(A)(3)
fugitive emissions	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(A)(2)
facility HAP restriction	OAC rule 3745-31-05(A)(3)
press emissions stack with no control	OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)(1)	<u>Applicable Emissions Limitations/Control Measures</u>	0.07 ton per year particulates; and 0.25 ton per year OC
OAC rule 3745-17-11(A)(2)	0.16 pound per hour and 0.69 ton per year of particulates; 0.49 pound per hour and 2.15 tons per year of OC;	20% opacity as a three-minute average
OAC rule 3745-31-05(A)(3)	0.05 pound per hour and 0.22 ton per year of formaldehyde; and 0.02 pound per hour and 0.09 ton per year of phenol	See Section 2.a
OAC rule 3745-17-07(B)(1)	See Section 2.b and 2.d	See Section 2.c
OAC rule 3745-17-08(B)(3)	20% opacity as a six-minute average, unless otherwise specified by the rule	
OAC rule 3745-31-05(C)	See Section 2.a	
	0.29 pound per hour and 1.28 tons per year of particulates; 1.10 pounds per hour and 4.82 tons per year OC; 0.01 pound per hour and 0.05 ton per year of formaldehyde; and 0.01 pound per hour and 0.05 ton per year of phenol	
	See section 2.d	
	20% opacity as a six-minute average, unless otherwise specified by the rule	
	See Section 2.a	

Modification Issued: 2/3/2005

2. Additional Terms and Conditions

- 2.a** The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.b** Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c** The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.
- 2.d** The hourly and annual emission HAPs limitations were established by a one-time worst case HAP emissions calculation for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. Scrubber No. 1 Operational Restrictions

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

2. Scrubber No. 2 Operational Restrictions

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

- a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.

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

C. Monitoring and/or Recordkeeping Requirements

1. Scrubber Monitoring Requirements

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

2. Scrubber Recordkeeping Requirements

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

- a. the pressure drop across the scrubber, in inches of water, once per shift;
- b. the scrubber water flow rate, in gallons per minute, once per shift;
- c. the pH of the scrubber liquor on an hourly basis;
- d. the oxidation-reduction potential of the scrubber liquor on an hourly basis; and
- e. a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain records of the facility's potential to emit for each individual

hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

D. Reporting Requirements

1. Scrubber Reporting Requirements

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

2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
20% opacity as a six-minute average (total emissions -scrubber stack and press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
20% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

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

- c. Emission Limitation:
0.16 pound per hour of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- d. Emission Limitation:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- e. Emission Limitation:
0.29 pound per hour of particulates (press emissions stack)

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- g. Emission Limitation:

40

Rieter

PTI A

Modification Issued: 2/3/2005

Emissions Unit ID: **P035**

0.07 tons per year of particulates (fugitive emissions)

Modification Issued: 2/3/2005

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- j. Emission Limitation:
1.10 pound per hour of organic compounds (OC) (press emissions stack)

Applicable Compliance Method:

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

- k. Emission Limitation:
4.82 tons per year of OC (press emissions stack)

Applicable Compliance Method:

Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.

- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)

Applicable Compliance Method:

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

Modification Issued: 2/3/2005

rule 3745-21-10(C).

- m. Emission Limitation:
Potential emissions from this facility shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

Applicable Compliance Method:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

- n. Emission Limitation:

0.05 pound per hour of formaldehyde (scrubber stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

- o. Emission Limitation:

0.22 ton per year of formaldehyde (scrubber stack emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.05 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

Emission Limitation:

- p. 0.02 pound per hour of phenol (scrubber stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

q. Emission Limitation:

0.09 ton per year of phenol (scrubber stack emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.02 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

r. Emission Limitation:

0.01 pound per hour of formaldehyde (press emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

s. Emission Limitation:

0.05 ton per year of formaldehyde (press emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

Emission Limitation:

t. 0.01 pound per hour of phenol (press emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in

accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

u. Emission Limitation:

0.05 ton per year of phenol (press emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit to install are federally enforceable.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the combined emissions from emissions units P033, P034, P035 and P036 for each pollutant:

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

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

MAGLC (ug/m³): 404.76

Emissions Unit ID: P035

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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. 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.

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PTI A

Modification Issued: 2/3/2005

Emissions Unit ID: P036

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>
P036 - 600 pounds per hour, steam assisted molding press, SDA Plus/Hett Press # 5 with 3 emission points: tool emissions controlled by a wet scrubber	OAC rule 3745-31-05(A)(3)
fugitive emissions	
facility HAP restriction	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(A)(2)
press emissions stack with no control	OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)(1)	Applicable Emissions Limitations/Control Measures	0.07 ton per year particulates; and 0.25 ton per year OC
OAC rule 3745-17-11(A)(2)	0.16 pound per hour and 0.69 ton per year of particulates; 0.49 pound per hour and 2.15 tons per year of OC;	20% opacity as a three-minute average
OAC rule 3745-31-05(A)(3)	0.05 pound per hour and 0.22 ton per year of formaldehyde; and 0.02 pound per hour and 0.09 ton per year of phenol	See Section 2.a
OAC rule 3745-17-07(B)(1)	See Section 2.b and 2.d	See Section 2.c
OAC rule 3745-17-08(B)(3)	20% opacity as a six-minute average, unless otherwise specified by the rule	
OAC rule 3745-31-05(C)	See Section 2.a	
	0.29 pound per hour and 1.28 tons per year of particulates; 1.10 pounds per hour and 4.82 tons per year OC; 0.01 pound per hour and 0.05 ton per year of formaldehyde; and 0.01 pound per hour and 0.05 ton per year of phenol	
	See section 2.d	
	20% opacity as a six-minute average, unless otherwise specified by the rule	
	See Section 2.a	

2. Additional Terms and Conditions

- 2.a The emission limitation established by this applicable regulation is equivalent to or less stringent than the emission limitation established by OAC rule 3745-31-05.
- 2.b Tool emissions shall be controlled by a venturi scrubber followed by a packed bed scrubber.
- 2.c The potential emissions [as defined by OAC rule 3745-77-01(BB)] of hazardous air pollutants (HAPs) from this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.
- 2.d The hourly and annual emission HAPs limitations were established by a one-time worst case HAP emissions calculation for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

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

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

 - a. The pressure drop across Scrubber #2 shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.

Modification Issued: 2/3/2005

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

C. Monitoring and/or Recordkeeping Requirements

1. Scrubber Monitoring Requirements

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

2. Scrubber Recordkeeping Requirements

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

- a. the pressure drop across the scrubber, in inches of water, once per shift;
- b. the scrubber water flow rate, in gallons per minute, once per shift;
- c. the pH of the scrubber liquor on an hourly basis;
- d. the oxidation-reduction potential of the scrubber liquor on an hourly basis; and
- e. a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain records of the facility's potential to emit for each individual

hazardous air pollutant and the total of all hazardous air pollutants combined by maintaining a formal up-to-date HAP emissions inventory from all HAP emissions units at the facility. The permittee shall maintain a record including methods, procedures and assumptions supporting the calculations.

D. Reporting Requirements

1. Scrubber Reporting Requirements

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

2. The permittee shall notify in writing the Toledo Division of Environmental Services within 2 weeks of becoming aware of an exceedance of either of the limits specified under A.2.c.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
20% opacity as a six-minute average (total emissions -scrubber stack and press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
20% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

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

- c. Emission Limitation:
0.16 pound per hour of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- d. Emission Limitation:
0.69 ton per year of particulates (tool emissions-scrubber stack)

Applicable Compliance Method:

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

- e. Emission Limitation:
0.29 pound per hour of particulates (press emissions stack)

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

Rieter

PTI A

Modification Issued: 2/3/2005

Emissions Unit ID: **P036**

- g. Emission Limitation:
0.07 tons per year of particulates (fugitive emissions)

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- j. Emission Limitation:
1.10 pound per hour of organic compounds (OC) (press emissions stack)

Applicable Compliance Method:

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

- k. Emission Limitation:
4.82 tons per year of OC (press emissions stack)

Applicable Compliance Method:

Compliance with the 1.10 pound per hour limit constitutes compliance with the ton per year limit.

- l. Emission Limitation:
0.25 ton per year of OC (fugitive emissions)

Applicable Compliance Method:

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

rule 3745-21-10(C).

- m. Emission Limitation:
Potential emissions from this facility shall not exceed 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs.

Applicable Compliance Method:
The monitoring & recordkeeping requirements in Section C.3. will be used to demonstrate compliance.

- n. Emission Limitation:

0.05 pound per hour of formaldehyde (scrubber stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

- o. Emission Limitation:

0.22 ton per year of formaldehyde (scrubber stack emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.05 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

Emission Limitation:

- p. 0.02 pound per hour of phenol (scrubber stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

q. Emission Limitation:

0.09 ton per year of phenol (scrubber stack emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.02 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

r. Emission Limitation:

0.01 pound per hour of formaldehyde (press emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

s. Emission Limitation:

0.05 ton per year of formaldehyde (press emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable formaldehyde emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

Emission Limitation:

t. 0.01 pound per hour of phenol (press emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through stack testing performed

Rieter**PTI A****Modification Issued: 2/3/2005**Emissions Unit ID: **P036**

in accordance with Method 320 of 40 CFR Part 63 Appendix A. Alternate, USEPA approved test methods, may be used with prior written approval.

u. Emission Limitation:

0.05 ton per year of phenol (press emissions)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit to install are federally enforceable.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the combined emissions from emissions units P033, P034, P035 and P036 for each pollutant:

Pollutant: ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 0.863

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

MAGLC (ug/m³): 404.76

Emissions Unit ID: P036

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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. 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.