State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 04-01353
Fac ID: 0448020035

DATE: 11/1/2005

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

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **TDES** **Toledo Met Area Council of Governments** **IN** **MI**

LUCAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **04-01353** FOR AN AIR CONTAMINANT SOURCE FOR
Rieter Automotive North America Inc

On 11/1/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Rieter Automotive North America Inc**, located at **645 N Lallendorf Rd, Oregon**, Ohio.

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

modification to revise BAT and increase throughput

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

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

DRAFT PERMIT TO INSTALL 04-01353

Application Number:	04-01353
Facility ID:	0448020035
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Rieter Automotive North America Inc
Person to Contact:	Steve Thomas
Address:	645 N Lallendorf Rd Oregon, OH 43616

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

Description of proposed emissions unit(s):
modification to revise BAT and increase throughput

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

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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.

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

Pollutant	Tons Per Year
PE	5.40 (2.76 decrease)
VOC	3.48 (25.40 decrease)
formaldehyde	0.20 (0.68 decrease)
phenol	0.92 (0.56 increase)

Emissions Unit ID: **P033**

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.

Operations, Property, and/or Equipment		
P033 - 600 pounds per hour, steam assisted molding press, SDA/Hett Press # 5, modification		
		fugitive emissions
tool emission stack with no control		
	press emissions stack(s) with no control	

Applicable Rules/Requirements		
	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B), (B)(3)
		OAC rule 3745-21-07(B)
OAC rule 3745-31-05(A)(3)		
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
	OAC rule 3745-21-07(B)	
	OAC rule 3745-31-05(A)(3)	
OAC rule 3745-17-07(A)(1)		
OAC rule 3745-17-11(A)(2)		
OAC rule 3745-21-07(B)		

Applicable Emissions Limitations/Control Measures		
		opacity as a three-minute average from any opening.
	The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 tons per rolling, 12-month period.	See Section 2.a.
		See Section 2.b.
	The emissions of volatile organic compounds (VOC) shall not exceed 0.12 pound per hour and 0.53 ton per rolling, 12-month period.	See Section 2.c.
The emissions of particulate (PE) shall not exceed 0.11 pound per hour and 0.48 ton per rolling, 12-month period.	The emissions of phenol shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.	
The emissions of volatile organic compounds (VOC) shall not exceed 0.07 pound per hour and 0.31 ton per rolling, 12-month period.	The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.	
The emissions of formaldehyde shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.	See Section 2.a.	
	See Section 2.b.	
The emissions of phenol shall not exceed 0.04 pound per hour and 0.18 ton per rolling, 12-month period.	See Section 2.c.	
	The emissions of particulate (PE) shall not exceed 0.04 ton per rolling, 12-month period.	
The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.	The emissions of volatile organic compounds (VOC) shall not exceed 0.03 ton per rolling, 12-month period.	
See Sections 2.a.		
See Section 2.b.	The visible emissions of particulate shall not exceed 10%	
See Section 2.c.		

2. Additional Terms and Conditions

2.a The hourly and annual emission limitations were established 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.

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

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 minimize or eliminate the visible emissions.

   If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, 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 weekly until such time as there are 4 consecutive operating weeks of no visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

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

   a. Emission Limitation:

      10% opacity as a six-minute average (scrubber stack and press emissions stack)

      Applicable Compliance Method:

      If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

10% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

If required, Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

0.11 pound per hour of particulate (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.48 ton per rolling, 12-month period of particulate (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.11 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

0.07 pound per hour of VOC (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission

limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 or 25A of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

f. Emission Limitation:

0.31 ton per rolling, 12-month period of VOC (tool emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (0.07 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

0.01 pound per hour of formaldehyde (tool emissions stack)

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.

h. Emission Limitation:

0.05 ton per rolling, 12-month period of formaldehyde (tool emissions stack)

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.

i. Emission Limitation:

0.04 pound per hour of phenol (tool emissions stack)

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.

j. Emission Limitation:

0.18 ton per rolling, 12-month period of phenol (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.04 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.

k. Emission Limitation:

0.19 pound per hour of particulate (press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

l. Emission Limitation:

0.83 tons per rolling, 12-month period of particulate (press emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.19 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m. Emission Limitation:

0.12 pound per hour of VOC (press emissions stack)

Applicable Compliance Method:

Emissions Unit ID: **P033**

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

n. Emission Limitation:

0.53 tons per rolling, 12-month period of VOC (press emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (1.10 lbs/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

o. Emission Limitation:

0.01 pound per hour of phenol (press emissions stack)

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.

p. Emission Limitation:

0.05 ton per rolling, 12-month period of phenol (press emissions stack)

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.

q. Emission Limitation:

0.04 ton per rolling, 12-month period of particulate (fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 10% opacity as a 3-minute average constitutes compliance with the ton per rolling, 12-month period limit.

r. Emission Limitation:

0.03 ton per rolling, 12-month period of VOC (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.

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 the contemporaneous modifications to emissions units P025 thru P036 for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lb/hr):	7.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	214
MAGLC (ug/m3):	410

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

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

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

5. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

7. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

8. The terms and conditions contained in this Permit to Install for emissions unit P033 supercede all requirements for P033 contained in PTI 04-01353 as issued February 3, 2005.

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.

Operations, Property, and/or Equipment		
P034 - 600 pounds per hour, steam assisted molding press, SDA/Hett Press # 6, modification		
tool emission stack with no control		fugitive emissions
	press emissions stack(s) with no control	

	OAC rule 3745-31-05(A)(3)
Applicable Rules/Requirements	
OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(A)(2) OAC rule 3745-21-07(B)
	OAC rule 3745-31-05(A)(3)
OAC rule 3745-17-07(A)(1)	
OAC rule 3745-17-11(A)(2)	
OAC rule 3745-21-07(B)	

OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(B)	Applicable Emissions Limitations/Control Measures The emissions of particulate (PE) shall not exceed 0.11 pound per hour and 0.48 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.07 pound per hour and 0.31 ton per rolling, 12-month period. The emissions of formaldehyde shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.04 pound per hour and 0.18 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average. See Sections 2.a. See Section 2.b. See Section 2.c.	The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 tons per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.12 pound per hour and 0.53 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average. See Section 2.a. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.04 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.03 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a three-minute average from any opening.

See Section 2.a.

See Section 2.b.

See Section 2.c.

2. Additional Terms and Conditions

2.a The hourly and annual emission limitations were established 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.

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

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, 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 weekly until such time as there are 4 consecutive operating weeks of no visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

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

a. Emission Limitation:

10% opacity as a six-minute average (scrubber stack and press emissions stack)

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

10% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

If required, Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

0.11 pound per hour of particulate (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.48 ton per rolling, 12-month period of particulate (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.11 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

0.07 pound per hour of VOC (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission

limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 or 25A of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

f. Emission Limitation:

0.31 ton per rolling, 12-month period of VOC (tool emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (0.07 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

0.01 pound per hour of formaldehyde (tool emissions stack)

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.

h. Emission Limitation:

0.05 ton per rolling, 12-month period of formaldehyde (tool emissions stack)

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.

i. Emission Limitation:

0.04 pound per hour of phenol (tool emissions stack)

Applicable Compliance Method:

Emissions Unit ID: **P034**

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.

j. Emission Limitation:

0.18 ton per rolling, 12-month period of phenol (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.04 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.

k. Emission Limitation:

0.19 pound per hour of particulate (press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

l. Emission Limitation:

0.83 tons per rolling, 12-month period of particulate (press emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.19 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m. Emission Limitation:

0.12 pound per hour of VOC (press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

n. Emission Limitation:

0.53 tons per rolling, 12-month period of VOC (press emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (1.10 lbs/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

o. Emission Limitation:

0.01 pound per hour of phenol (press emissions stack)

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.

p. Emission Limitation:

0.05 ton per rolling, 12-month period of phenol (press emissions stack)

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.

q. Emission Limitation:

0.04 ton per rolling, 12-month period of particulate (fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 10% opacity as a 3-minute average constitutes compliance with the ton per rolling, 12-month period limit.

r. Emission Limitation:

0.03 ton per rolling, 12-month period of VOC (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.

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 the contemporaneous modifications to emissions units P025 thru P036 for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lb/hr):	7.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	214
MAGLC (ug/m3):	410

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

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

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

5. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

7. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

8. The terms and conditions contained in this Permit to Install for emissions unit P034 supercede all requirements for P034 contained in PTI 04-01353 as issued February 3, 2005.

Emissions Unit ID: **P035**

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.

Operations, Property, and/or Equipment		
P035 - 600 pounds per hour, steam assisted molding press, SDA/Hett Press # 7, modification tool emission stack with no control	press emissions stack(s) with no control	fugitive emissions

Applicable Rules/Requirements		
	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B), (B)(3)
		OAC rule 3745-21-07(B)
OAC rule 3745-31-05(A)(3)		
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
	OAC rule 3745-21-07(B)	
	OAC rule 3745-31-05(A)(3)	
OAC rule 3745-17-07(A)(1)		
OAC rule 3745-17-11(A)(2)		
OAC rule 3745-21-07(B)		

Applicable Emissions Limitations/Control Measures		
		average from any opening.
	The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 tons per rolling, 12-month period.	See Section 2.a.
		See Section 2.b.
	The emissions of volatile organic compounds (VOC) shall not exceed 0.12 pound per hour and 0.53 ton per rolling, 12-month period.	See Section 2.c.
The emissions of particulate (PE) shall not exceed 0.11 pound per hour and 0.48 ton per rolling, 12-month period.	The emissions of phenol shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.	
The emissions of volatile organic compounds (VOC) shall not exceed 0.07 pound per hour and 0.31 ton per rolling, 12-month period.	The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.	
The emissions of formaldehyde shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.	See Section 2.a.	
	See Section 2.b.	
The emissions of phenol shall not exceed 0.04 pound per hour and 0.18 ton per rolling, 12-month period.	See Section 2.c.	
	The emissions of particulate (PE) shall not exceed 0.04 ton per rolling, 12-month period.	
The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.	The emissions of volatile organic compounds (VOC) shall not exceed 0.03 ton per rolling, 12-month period.	
See Sections 2.a.		
See Section 2.b.	The visible emissions of particulate shall not exceed 10% opacity as a three-minute	
See Section 2.c.		

2. Additional Terms and Conditions

2.a The hourly and annual emission limitations were established 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.

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

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 minimize or eliminate the visible emissions.

   If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, 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 weekly until such time as there are 4 consecutive operating weeks of no visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

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

   a. Emission Limitation:

      10% opacity as a six-minute average (scrubber stack and press emissions stack)

      Applicable Compliance Method:

      If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

10% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

If required, Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

0.11 pound per hour of particulate (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.48 ton per rolling, 12-month period of particulate (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.11 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

0.07 pound per hour of VOC (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission

limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 or 25A of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

f. Emission Limitation:

0.31 ton per rolling, 12-month period of VOC (tool emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (0.07 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

0.01 pound per hour of formaldehyde (tool emissions stack)

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.

h. Emission Limitation:

0.05 ton per rolling, 12-month period of formaldehyde (tool emissions stack)

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.

i. Emission Limitation:

0.04 pound per hour of phenol (tool emissions stack)

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.

j. Emission Limitation:

0.18 ton per rolling, 12-month period of phenol (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.04 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.

k. Emission Limitation:

0.19 pound per hour of particulate (press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

l. Emission Limitation:

0.83 tons per rolling, 12-month period of particulate (press emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.19 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m. Emission Limitation:

0.12 pound per hour of VOC (press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

n. Emission Limitation:

0.53 tons per rolling, 12-month period of VOC (press emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (1.10 lbs/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

o. Emission Limitation:

0.01 pound per hour of phenol (press emissions stack)

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.

p. Emission Limitation:

0.05 ton per rolling, 12-month period of phenol (press emissions stack)

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.

q. Emission Limitation:

0.04 ton per rolling, 12-month period of particulate (fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 10% opacity as a 3-minute average constitutes compliance with the ton per rolling, 12-month period limit.

r. Emission Limitation:

0.03 ton per rolling, 12-month period of VOC (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.

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 the contemporaneous modifications to emissions units P025 thru P036 for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lb/hr):	7.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	214
MAGLC (ug/m3):	410

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

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

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

5. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

7. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

8. The terms and conditions contained in this Permit to Install for emissions unit P035 supercede all requirements for P035 contained in PTI 04-01353 as issued February 3, 2005.

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.

Operations, Property, and/or Equipment		
P036 - 600 pounds per hour, steam assisted molding press, SDA/Hett Press #8, modification		fugitive emissions
tool emission stack with no control	press emissions stack(s) with no control	

Applicable Rules/Requirements		
	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B), (B)(3)
		OAC rule 3745-21-07(B)
OAC rule 3745-31-05(A)(3)		
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11(A)(2)	
	OAC rule 3745-21-07(B)	
	OAC rule 3745-31-05(A)(3)	
OAC rule 3745-17-07(A)(1)		
OAC rule 3745-17-11(A)(2)		
OAC rule 3745-21-07(B)		

Applicable Emissions Limitations/Control Measures The emissions of particulate (PE) shall not exceed 0.11 pound per hour and 0.48 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.07 pound per hour and 0.31 ton per rolling, 12-month period. The emissions of formaldehyde shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.04 pound per hour and 0.18 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average. See Sections 2.a. See Section 2.b. See Section 2.c.	The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 tons per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.12 pound per hour and 0.53 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average. See Section 2.a. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.04 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.03 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10%	opacity as a three-minute average from any opening. See Section 2.a. See Section 2.b. See Section 2.c.

2. Additional Terms and Conditions

2.a The hourly and annual emission limitations were established 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.

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

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 minimize or eliminate the visible emissions.

   If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, 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 weekly until such time as there are 4 consecutive operating weeks of no visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Toledo Division of Environmental Services) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

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

   a. Emission Limitation:

      10% opacity as a six-minute average (scrubber stack and press emissions stack)

      Applicable Compliance Method:

      If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

10% opacity as a three-minute average (fugitive emissions)

Applicable Compliance Method:

If required, Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

0.11 pound per hour of particulate (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.48 ton per rolling, 12-month period of particulate (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.11 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

0.07 pound per hour of VOC (tool emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission

limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 or 25A of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

f. Emission Limitation:

0.31 ton per rolling, 12-month period of VOC (tool emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (0.07 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

0.01 pound per hour of formaldehyde (tool emissions stack)

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.

h. Emission Limitation:

0.05 ton per rolling, 12-month period of formaldehyde (tool emissions stack)

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.

i. Emission Limitation:

0.04 pound per hour of phenol (tool emissions stack)

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.

j. Emission Limitation:

0.18 ton per rolling, 12-month period of phenol (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.04 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.

k. Emission Limitation:

0.19 pound per hour of particulate (press emissions stack)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

l. Emission Limitation:

0.83 tons per rolling, 12-month period of particulate (press emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.19 lb/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m. Emission Limitation:

0.12 pound per hour of VOC (press emissions stack)

Applicable Compliance Method:

Emissions Unit ID: **P036**

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10(C).

n. Emission Limitation:

0.53 tons per rolling, 12-month period of VOC (press emissions stack)

Applicable Compliance Method

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (1.10 lbs/hr) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

o. Emission Limitation:

0.01 pound per hour of phenol (press emissions stack)

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.

p. Emission Limitation:

0.05 ton per rolling, 12-month period of phenol (press emissions stack)

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.

q. Emission Limitation:

0.04 ton per rolling, 12-month period of particulate (fugitive emissions)

Applicable Compliance Method:

Compliance with the visible emissions limitation of 10% opacity as a 3-minute average constitutes compliance with the ton per rolling, 12-month period limit.

r. Emission Limitation:

0.03 ton per rolling, 12-month period of VOC (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.

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 the contemporaneous modifications to emissions units P025 thru P036 for each pollutant:

Pollutant:	ammonia
TLV (ug/m3):	17,000
Maximum Hourly Emission Rate (lb/hr):	7.79
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	214
MAGLC (ug/m3):	410

3. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

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

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

4. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

5. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

7. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07. If it is determined by the Ohio EPA that odor from this emissions unit is causing a public nuisance, then the permittee shall implement measures to reduce odor to an acceptable level.

8. The terms and conditions contained in this Permit to Install for emissions unit P036 supercede all requirements for P036 contained in PTI 04-01353 as issued February 3, 2005.