

Facility ID: 0448020035 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0448020035 Emissions Unit ID: P025 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P025 - 600 pounds per hour steam assisted molding press, SDA Plus Press #1 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01197 as modified 4/10/2007)	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.
press emissions stack(s) with no control	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) (PTI 04-01197 as modified 4/10/2007)	See Section 2.a. See Section 2.b. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) 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 Section 2.a.
	OAC rule 3745-17-07(A)(1)	See Section 2.b.
	OAC rule 3745-17-11(A)(2)	See Section 2.b.
	OAC rule 3745-21-07(B)	See Section 2.c.
fugitive emissions	OAC rule 3745-31-05(A)(3) (PTI 04-01197 as modified 4/10/2007)	The emissions of particulate (PE) shall not exceed 0.05 ton per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.01 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.
	OAC rule 3745-17-07(B)(1)	See Section 2.b.
	OAC rule 3745-17-08(B), (B)(3)	See Section 2.b.
	OAC rule 3745-21-07(B)	See Section 2.c.

2. Additional Terms and Conditions

- (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. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). 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 Permit to Install 04-01197.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping 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 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):
Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).
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).

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).

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.

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).

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.

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.

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.

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.

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.

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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).
Emission Limitation:

0.83 ton 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.
Emission Limitation:

0.04 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).
Emission Limitation:

0.18 ton 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 (0.04 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.
Emission Limitation:

0.05 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.
Emission Limitation:

0.01 ton per rolling, 12-month period of VOC (fugitive)

Applicable Compliance Method

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. of this permit are made are federally enforceable through PTI 04-01197.
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 ISC3 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.

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Facility ID: 0448020035 Emissions Unit ID: P026 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - 600 pounds per hour steam assisted molding press, SDA Plus Press #2 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01197 as modified 4/10/2007)	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 Section 2.a.
		See Section 2.b.
		See Section 2.b.
		See Section 2.c.
press emissions stack(s) with no control	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) (PTI 04-01197 as modified 4/10/2007)	The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 ton per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) 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 Section 2.a.
		See Section 2.b.
		See Section 2.b.
		See Section 2.c.
fugitive emissions	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) (PTI 04-01197 as modified 4/10/2007)	The emissions of particulate (PE) shall not exceed 0.05 ton per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.01 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.b.
		See Section 2.c.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(B)	See Section 2.b. See Section 2.b. See Section 2.c.

2. **Additional Terms and Conditions**

- (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.
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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 Permit to Install 04-01197.

B. **Operational Restrictions**

- 1. None

C. **Monitoring and/or Record Keeping 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 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):
Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

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).

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.

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).

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.

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.

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.

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.

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.

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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

0.83 ton 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.

Emission Limitation:

0.04 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).

Emission Limitation:

0.18 ton 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 (0.04 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.01 ton per rolling, 12-month period of VOC (fugitive)

Applicable Compliance Method

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

F. **Miscellaneous Requirements**

1. All requirements of Sections A through E. of this permit are made are federally enforceable through PTI 04-01197.
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 ISC3 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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020035 Emissions Unit ID: P027 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - 600 pounds per hour steam assisted molding press, SDA Plus Press #3 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01197 as modified 4/10/2007)	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.
press emissions stack(s) with no control	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) (PTI 04-01197 as modified 4/10/2007)	See Section 2.a.
		See Section 2.b.
		See Section 2.b.
		See Section 2.c.
		The emissions of particulate (PE) shall not exceed 0.19 pound per hour and 0.83 ton per rolling, 12-month period.
fugitive emissions	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) (PTI 04-01197 as modified 4/10/2007)	The emissions of volatile organic compounds (VOC) 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 Section 2.a.
		See Section 2.b.
		See Section 2.c.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(B)	The emissions of particulate (PE) shall not exceed 0.05 ton per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.01 ton per rolling, 12-month period.
		The visible emissions of particulate shall not exceed 10% opacity as a three-minute average from any opening.

2. Additional Terms and Conditions

(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.
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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 Permit to Install 04-01197.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping 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 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):

Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

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).

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.

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).

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.

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.

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.

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.

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.

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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

0.83 ton 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.

Emission Limitation:

0.04 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).

Emission Limitation:

0.18 ton 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 (0.04 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.01 ton per rolling, 12-month period of VOC (fugitive)

Applicable Compliance Method

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. of this permit are made are federally enforceable through PTI 04-01197.
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 ISC3 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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020035 Emissions Unit ID: P028 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - 800 pounds per hour steam assisted molding press, SDA Plus Press #4 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01197 as modified 4/10/2007)	The emissions of particulate (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period. The emissions of formaldehyde shall not exceed 0.02 pound per hour and 0.09 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.
press emissions stack(s) with no control	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) (PTI 04-01197 as modified 4/10/2007)	See Sections 2.a. See Section 2.b. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.27 pound per hour and 1.18 tons per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.
fugitive emissions	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) (PTI 04-01197 as modified 4/10/2007)	See Section 2.a. See Section 2.b. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.06 ton per rolling, 12-month period.

The emissions of volatile organic compounds (VOC) shall not exceed 0.01 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.

OAC rule 3745-17-07(B)(1) See Section 2.b.

OAC rule 3745-17-08(B), (B)(3) See Section 2.b.

OAC rule 3745-21-07(B) See Section 2.c.

2. Additional Terms and Conditions

- (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.
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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 Permit to Install 04-01197.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping 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 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):
Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

Emission Limitation:

0.14 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).

Emission Limitation:

0.61 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 (0.14 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.

Emission Limitation:

0.09 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).

Emission Limitation:

0.39 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 (0.09 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.

Emission Limitation:

0.02 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.

Emission Limitation:

0.09 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 (0.02 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.22 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 (0.05 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:

0.27 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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

1.18 ton 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 (0.27 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.

Emission Limitation:

0.05 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).

Emission Limitation:

0.22 ton 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 (0.05 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.

Emission Limitation:

0.06 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.

Emission Limitation:

0.01 ton per rolling, 12-month period of VOC (fugitive)

Applicable Compliance Method

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. of this permit are made are federally enforceable through PTI 04-01197.
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 ISC3 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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020035 Emissions Unit ID: P029 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P029 - 800 pounds per hour steam assisted molding press, SDA/Hett Press #1 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01257 as modified 12/20/2005)	<p>The emissions of particulate (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period.</p> <p>The emissions of volatile organic compounds (VOC) shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period.</p> <p>The emissions of formaldehyde shall not exceed 0.02 pound per hour and 0.09 ton per rolling, 12-month period.</p> <p>The emissions of phenol shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period.</p> <p>The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.</p>

		See Sections 2.a.
	OAC rule 3745-17-07(A)(1)	See Section 2.b.
	OAC rule 3745-17-11(A)(2)	See Section 2.b.
	OAC rule 3745-21-07(B)	See Section 2.c.
press emissions stack(s) with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.27 pound per hour and 1.18 tons per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.16 pound per hour and 0.70 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.
	OAC rule 3745-17-07(A)(1)	See Section 2.b.
	OAC rule 3745-17-11(A)(2)	See Section 2.b.
	OAC rule 3745-21-07(B)	See Section 2.c.
fugitive emissions	OAC rule 3745-31-05(A)(3) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.06 ton per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.04 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.
	OAC rule 3745-17-07(B)(1)	See Section 2.b.
	OAC rule 3745-17-08(B), (B)(3)	See Section 2.b.
	OAC rule 3745-21-07(B)	See Section 2.c.

2. **Additional Terms and Conditions**

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

B. **Operational Restrictions**

- 1. None

C. **Monitoring and/or Record Keeping 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 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):

Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

Emission Limitation:

0.14 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).

Emission Limitation:

0.61 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 (0.14 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.

Emission Limitation:

0.09 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).

Emission Limitation:

0.39 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 (0.09 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.

Emission Limitation:

0.02 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.

Emission Limitation:

0.09 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 (0.02 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.22 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 (0.05 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:

0.27 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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

1.18 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 (0.27 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.

Emission Limitation:

0.16 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).

Emission Limitation:

0.70 ton 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 (0.16 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.

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.

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.

Emission Limitation:

0.06 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.

Emission Limitation:

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

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit 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 (lbs/hr): 7.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 214

MAGLC (ug/m3): 404.76
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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020035 Emissions Unit ID: P030 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P030 - 800 pounds per hour steam assisted molding press, SDA/Hett Press #2 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period. The emissions of formaldehyde shall not exceed 0.02 pound per hour and 0.09 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.
press emissions stack(s) with no control	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) (PTI 04-01257 as modified 12/20/2005)	See Sections 2.a. See Section 2.b. See Section 2.b See Section 2.c. The emissions of particulate (PE) shall not exceed 0.27 pound per hour and 1.18 tons per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.16 pound per hour and 0.70 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.
fugitive emissions	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) (PTI 04-01257 as modified 12/20/2005)	See Section 2.a. See Section 2.b. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.06 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.04 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a three-minute average from any opening.
	OAC rule 3745-17-07(B)(1)	See Section 2.a. See Section 2.b.

OAC rule 3745-17-08(B), (B)(3) See Section 2.b.
 OAC rule 3745-21-07(B) See Section 2.c.

2. Additional Terms and Conditions

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

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping 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 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):

Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

Emission Limitation:

0.14 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).

Emission Limitation:

0.61 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 (0.14 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.

Emission Limitation:

0.09 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).

Emission Limitation:

0.39 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 (0.09 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.

Emission Limitation:

0.02 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.

Emission Limitation:

0.09 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 (0.02 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.22 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 (0.05 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:

0.27 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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

1.18 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 (0.27 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.

Emission Limitation:

0.16 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).
Emission Limitation:

0.70 ton 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 (0.16 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.

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.

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.

Emission Limitation:

0.06 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.

Emission Limitation:

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

Applicable Compliance Method

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit 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 (lbs/hr): 7.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 214

MAGLC (ug/m3): 404.76
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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020035 Emissions Unit ID: P031 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P031 - 800 pounds per hour steam assisted molding press, SDA/Hett Press #3 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period. The emissions of formaldehyde shall not exceed 0.02 pound per hour and 0.09 ton per rolling, 12-month period.

		The emissions of phenol shall not exceed 0.05 pound per hour and 0.22 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.b.
		See Section 2.c.
press emissions stack(s) with no control	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) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.27 pound per hour and 1.18 tons per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.16 pound per hour and 0.70 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.b.
		See Section 2.c.
fugitive emissions	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) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.06 ton per rolling, 12-month period.
		The emissions of volatile organic compounds (VOC) shall not exceed 0.04 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.b.
		See Section 2.c.

2. Additional Terms and Conditions

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

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping 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 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):

Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

Emission Limitation:

0.14 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).

Emission Limitation:

0.61 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 (0.14 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.

Emission Limitation:

0.09 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).

Emission Limitation:

0.39 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 (0.09 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.

Emission Limitation:

0.02 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.

Emission Limitation:

0.09 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 (0.02 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.22 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 (0.05 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:

0.27 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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

1.18 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 (0.27 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.

Emission Limitation:

0.16 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).

Emission Limitation:

0.70 ton 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 (0.16 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.

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.

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.

Emission Limitation:

0.06 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.

Emission Limitation:

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

Applicable Compliance Method

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit 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 (lbs/hr): 7.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 214

MAGLC (ug/m3): 404.76
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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0448020035 Emissions Unit ID: P032 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P032 - 800 pounds per hour steam assisted molding press, SDA/Hett Press #4 tool emission stack with no control	OAC rule 3745-31-05(A)(3) (PTI 04-01257 as modified 12/20/2005)	The emissions of particulate (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period. The emissions of formaldehyde shall not exceed 0.02 pound per hour and 0.09 ton per rolling, 12-month period. The emissions of phenol shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period. The visible emissions of particulate shall not exceed 10% opacity as a six-minute average.
press emissions stack(s) with no control	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) (PTI 04-01257 as modified 12/20/2005)	See Sections 2.a. See Section 2.b. See Section 2.b See Section 2.c. The emissions of particulate (PE) shall not exceed 0.27 pound per hour and 1.18 tons per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.16 pound per hour and 0.70 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.
fugitive emissions	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) (PTI 04-01257 as modified 12/20/2005)	See Section 2.a. See Section 2.b. See Section 2.b. See Section 2.c. The emissions of particulate (PE) shall not exceed 0.06 ton per rolling, 12-month period. The emissions of volatile organic compounds (VOC) shall not exceed 0.04 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.

OAC rule 3745-17-07(B)(1) See Section 2.b.

OAC rule 3745-17-08(B), (B)(3) See Section 2.b.

OAC rule 3745-21-07(B) See Section 2.c.

2. Additional Terms and Conditions

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

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping 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 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):

Emission Limitation:

10% opacity as a six-minute average (tool emissions 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).

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).

Emission Limitation:

0.14 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).

Emission Limitation:

0.61 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 (0.14 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.

Emission Limitation:

0.09 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).

Emission Limitation:

0.39 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 (0.09 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.

Emission Limitation:

0.02 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.

Emission Limitation:

0.09 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 (0.02 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.

Emission Limitation:

0.05 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.

Emission Limitation:

0.22 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 (0.05 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:

0.27 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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Emission Limitation:

1.18 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 (0.27 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.

Emission Limitation:

0.16 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).

Emission Limitation:

0.70 ton 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 (0.16 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.

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.

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.

Emission Limitation:

0.06 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.

Emission Limitation:

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

Applicable Compliance Method

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

F. Miscellaneous Requirements

1. All requirements of Sections A through E. this permit 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 (lbs/hr): 7.79

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 214

MAGLC (ug/m3): 404.76
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.