



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/11/2013

MIKE SCOTT
AUTONEUM
645 N LALENDORF RD
OREGON, OH 43616

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448020035
Permit Number: P0112970
Permit Type: Renewal
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: TDES



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AUTONEUM**

Facility ID:	0448020035
Permit Number:	P0112970
Permit Type:	Renewal
Issued:	4/11/2013
Effective:	4/11/2013
Expiration:	2/23/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
AUTONEUM

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Final Permit-to-Install and Operate
AUTONEUM
Permit Number: P0112970
Facility ID: 0448020035
Effective Date: 4/11/2013

Authorization

Facility ID: 0448020035
Application Number(s): A0046886
Permit Number: P0112970
Permit Description: PTIO renewal for semi-cured padding material molding presses used to form automotive sound absorbers.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/11/2013
Effective Date: 4/11/2013
Expiration Date: 2/23/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AUTONEUM
645 N LALLENDORF RD
Oregon, OH 43616

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112970

Permit Description: PTIO renewal for semi-cured padding material molding presses used to form automotive sound absorbers.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID: P028
 Company Equipment ID: SDA Plus #4
 Superseded Permit Number: 04-01197
 General Permit Category and Type: Not Applicable

Group Name: P025, P026, and P027

Emissions Unit ID:	P025
Company Equipment ID:	SDA Plus #1
Superseded Permit Number:	04-01197
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	SDA Plus #2
Superseded Permit Number:	04-01197
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	SDA Plus #3
Superseded Permit Number:	04-01197
General Permit Category and Type:	Not Applicable

Group Name: P029, P030, P031, and P032

Emissions Unit ID:	P029
Company Equipment ID:	SDA Plus/Hett #1
Superseded Permit Number:	04-01257
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	SDA Plus/Hett #2
Superseded Permit Number:	04-01257
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	SDA Plus/Hett #3
Superseded Permit Number:	04-01257
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	SDA Plus/Hett #4
Superseded Permit Number:	04-01257
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
AUTONEUM
Permit Number: P0112970
Facility ID: 0448020035
Effective Date: 4/11/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.



5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?



You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
AUTONEUM
Permit Number: P0112970
Facility ID: 0448020035
Effective Date: 4/11/2013

B. Facility-Wide Terms and Conditions



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



Final Permit-to-Install and Operate
AUTONEUM
Permit Number: P0112970
Facility ID: 0448020035
Effective Date: 4/11/2013

C. Emissions Unit Terms and Conditions



1. P028, SDA Plus #4

Operations, Property and/or Equipment Description:

800 pounds per hour molding press for semi-cured padding with no control equipment (SDA Plus #4)

a) 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. d)(3), d)(4), d)(5), and e)(4).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01197 Administrative Modification issued 4/10/2007)	<p><u>Tool Emissions Stack:</u></p> <p>Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period.</p> <p>Formaldehyde emissions shall not exceed 0.02 pound per hour and 0.09 ton per rolling, 12-month period.</p> <p>Phenol emissions shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible particulate emissions shall not exceed 10% opacity as a six-minute average.</p> <p>see b)(2)a.</p> <p><u>Press Emissions Stack:</u> PE shall not exceed 0.27 pound per hour and 1.18 ton per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period.</p> <p>Visible particulate emissions shall not exceed 10% opacity as a six-minute average.</p> <p>see b)(2)a.</p> <p><u>Fugitive Emissions Limitations</u> Fugitive PE shall not exceed 0.06 ton per rolling, 12-month period.</p> <p>Fugitive VOC emissions shall not exceed 0.01 ton per rolling, 12-month period.</p> <p>Fugitive visible particulate emissions shall not exceed 10 percent opacity as a three-minute average.</p> <p>see b)(2)a.</p>
b.	OAC rule 3745-17-07(A)(1)	see b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	see b)(2)b.
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)b.
e.	OAC rule 3745-17-11(B)	see b)(2)b.

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



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to weekly until such time as there are 4 consecutive operating weeks of no visible emissions.
- (3) The PTI application for these emissions units, P025 through P032, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from



the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X = 24" hours per day and "Y = 7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 7.79

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

MAGLC (ug/m³): 410

The permittee, has demonstrated that emissions of ammonia, from emissions units P025 through P032, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall



not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final Permit to Install and Operate prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F),



initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- e. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) and d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions shall not exceed 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).

b. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 10% opacity as a three-minute average.

Applicable Compliance Method:

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

c. Emission Limitation:

PE shall not exceed 0.14 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

d. Emission Limitation:

PE shall not exceed 0.61 ton per rolling, 12-month period (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.

e. Emission Limitation:

VOC emissions shall not exceed 0.09 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

f. Emission Limitation:

VOC emissions shall not exceed 0.39 ton per rolling, 12-month period (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.

g. Emission Limitation:

Formaldehyde emissions shall not exceed 0.02 pound per hour (tool emissions stack)

Applicable Compliance Method:

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

h. Emission Limitation:

Formaldehyde emissions shall not exceed 0.09 ton per rolling, 12-month period (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.

i. Emission Limitation:

Phenol emissions shall not exceed 0.05 pound per hour (tool emissions stack)

Applicable Compliance Method:

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

j. Emission Limitation:

Phenol emissions shall not exceed 0.22 ton per rolling, 12-month period (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.

k. Emission Limitation:

PE shall not exceed 0.27 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

l. Emission Limitation:

PE shall not exceed 1.18 ton per rolling, 12-month period (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.



m. Emission Limitation:

VOC emissions shall not exceed 0.05 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

n. Emission Limitation:

VOC emissions shall not exceed 0.22 ton per rolling, 12-month period (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.

o. Emission Limitation:

PE shall not exceed 0.06 ton per rolling, 12-month period (fugitive emissions)

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the permittee's estimate that up to 5% of the press emissions would be emitted as fugitive. Compliance with the visible emissions limitation of 10% opacity as a 3-minute will be considered to be adequate demonstration of compliance with the ton per rolling, 12-month period emission limitation..

p. Emission Limitation:

VOC emissions shall not exceed 0.01 ton per rolling, 12-month period (fugitive)

Applicable Compliance Method

This emissions limitation was established by the permittee to reflect the potential to emit for this emissions unit based on the permittee's estimate that up to 5% of the press emissions would be emitted as fugitive.

g) Miscellaneous Requirements

(1) None.



Final Permit-to-Install and Operate
AUTONEUM
Permit Number: P0112970
Facility ID: 0448020035
Effective Date: 4/11/2013



2. Emissions Unit Group -P025, P026, and P027: P025,P026,P027

EU ID	Operations, Property and/or Equipment Description
P025	600 pounds per hour molding press for semi-cured padding with no control equipment (SDA Plus #1)
P026	600 pounds per hour molding press for semi-cured padding with no control equipment (SDA Plus #2)
P027	600 pounds per hour molding press for semi-cured padding with no control equipment (SDA Plus #3)

a) 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. d)(3), d)(4), d)(5), and e)(4).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01197 Administrative Modification issued 4/10/2007)	<u>Tool Emissions Stack:</u> Particulate emissions (PE) shall not exceed 0.11 pound per hour and 0.48 ton per rolling, 12-month period. Volatile organic compound (VOC) emissions shall not exceed 0.07 pound per hour and 0.31 ton per rolling, 12-month period. Formaldehyde emissions shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Phenol emissions shall not exceed 0.04 pound per hour and 0.18 ton per rolling, 12-month period.</p> <p>Visible particulate emissions shall not exceed 10% opacity as a six-minute average.</p> <p>see b)(2)b.</p> <p><u>Press Emissions Stack:</u> PE shall not exceed 0.19 pound per hour and 0.83 ton per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 0.04 pound per hour and 0.18 ton per rolling, 12-month period.</p> <p>Visible particulate emissions shall not exceed 10% opacity as a six-minute average.</p> <p>see b)(2)b.</p> <p><u>Fugitive Emissions Limitations</u> Fugitive PE shall not exceed 0.05 ton per rolling, 12-month period.</p> <p>Fugitive VOC emissions shall not exceed 0.01 ton per rolling, 12-month period.</p> <p>Fugitive visible particulate emissions shall not exceed 10 percent opacity as a three-minute average.</p> <p>see b)(2)b.</p>
b.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
c.	OAC rule 3745-17-07(B)(1)	see b)(2)c.
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)c.
e.	OAC rule 3745-17-11(B)	see b)(2)c.

(2) Additional Terms and Conditions

- a. All requirements specified in Section C.2 of this permit apply to each emissions unit (P025, P026, and P027).



- b. 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.
 - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- (2) If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to weekly until such time as there are 4 consecutive operating weeks of no visible emissions.



(3) The PTI application for these emissions units, P025 through P032, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X = 24" hours per day and "Y = 7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Ammonia

TLV (mg/m3): 17



Maximum Hourly Emission Rate (lbs/hr): 7.79

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

MAGLC (ug/m3): 410

The permittee, has demonstrated that emissions of ammonia, from emissions units P025 through P032, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final Permit to Install and Operate prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s)



modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) and d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and



- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- f) **Testing Requirements**
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**

Visible particulate emissions shall not exceed 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).
 - b. **Emission Limitation:**

Fugitive visible particulate emissions shall not exceed 10% opacity as a three-minute average.

Applicable Compliance Method:

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

PE shall not exceed 0.11 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.



d. Emission Limitation:

PE shall not exceed 0.48 ton per rolling, 12-month period (tool emissions stack)

Applicable Compliance Method:

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

e. Emission Limitation:

VOC emissions shall not exceed 0.07 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

f. Emission Limitation:

VOC emissions shall not exceed 0.31 ton per rolling, 12-month period (tool emissions stack)

Applicable Compliance Method

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

g. Emission Limitation:

Formaldehyde emissions shall not exceed 0.01 pound per hour (tool emissions stack)

Applicable Compliance Method:

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

h. Emission Limitation:



Formaldehyde emissions shall not exceed 0.05 ton per rolling, 12-month period (tool emissions stack)

Applicable Compliance Method:

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

i. Emission Limitation:

Phenol emissions shall not exceed 0.04 pound per hour (tool emissions stack)

Applicable Compliance Method:

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

j. Emission Limitation:

Phenol emissions shall not exceed 0.18 ton per rolling, 12-month period (tool emissions stack)

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable phenol emissions limitation (0.04 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emissions limitation.

k. Emission Limitation:

PE shall not exceed 0.19 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

l. Emission Limitation:

PE shall not exceed 0.83 ton per rolling, 12-month period (press emissions stack)



Applicable Compliance Method:

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

m. Emission Limitation:

VOC emissions shall not exceed 0.04 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

n. Emission Limitation:

VOC emissions shall not exceed 0.18 ton per rolling, 12-month period (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.

o. Emission Limitation:

PE shall not exceed 0.05 ton per rolling, 12-month period (fugitive emissions)

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the permittee's estimate that up to 5% of the press emissions would be emitted as fugitive. Compliance with the visible emissions limitation of 10% opacity as a 3-minute will be considered to be adequate demonstration of compliance with the ton per rolling, 12-month period emission limitation..

p. Emission Limitation:

VOC emissions shall not exceed 0.01 ton per rolling, 12-month period (fugitive)

Applicable Compliance Method



Final Permit-to-Install and Operate

AUTONEUM

Permit Number: P0112970

Facility ID: 0448020035

Effective Date: 4/11/2013

This emissions limitation was established by the permittee to reflect the potential to emit for this emissions unit based on the permittee's estimate that up to 5% of the press emissions would be emitted as fugitive.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -P029, P030, P031, and P032: P029,P030,P031,P032

EU ID	Operations, Property and/or Equipment Description
P029	800 pounds per hour steam assisted molding press with no control equipment (SDA Plus/Hett #1)
P030	800 pounds per hour steam assisted molding press with no control equipment (SDA Plus/Hett 2)
P031	800 pounds per hour steam assisted molding press with no control equipment (SDA Plus/Hett #3)
P032	800 pounds per hour steam assisted molding press with no control equipment (SDA Plus/Hett #4)

a) 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. d)(3), d)(4), d)(5), and e)(4).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01257 Administrative Modification issued 12/20/2005)	<u>Tool Emissions Stack</u> Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per rolling, 12-month period. Volatile organic compound (VOC) emissions shall not exceed 0.09 pound per hour and 0.39 ton per rolling, 12-month period. Formaldehyde emissions shall not exceed 0.02 pound per hour and 0.09 ton



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>per rolling, 12-month period.</p> <p>Phenol emissions shall not exceed 0.05 pound per hour and 0.22 ton per rolling, 12-month period.</p> <p>Visible particulate emissions shall not exceed 10% opacity as a six-minute average.</p> <p>see b)(2)b.</p> <p><u>Press Emissions Stack</u> PE shall not exceed 0.27 pound per hour and 1.18 tons per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 0.16 pound per hour and 0.70 ton per rolling, 12-month period.</p> <p>Phenol emissions shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.</p> <p>Visible particulate emissions shall not exceed 10% opacity as a six-minute average.</p> <p>see b)(2)b.</p> <p><u>Fugitive Emissions</u> PE shall not exceed 0.06 ton per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 0.04 ton per rolling, 12-month period.</p> <p>Visible fugitive particulate emissions shall not exceed 10% opacity as a three-minute average.</p> <p>see b)(2)b.</p>
b.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
c.	OAC rule 3745-17-07(B)(1)	see b)(2)c.
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)c.
e.	OAC rule 3745-17-11(B)	see b)(2)c.



(2) Additional Terms and Conditions

- a. All requirements specified in Section C.3 of this permit apply to each emissions unit (P029, P030, P031, and P032).
- b. 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.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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



- (2) If the daily checks show no visible emissions for 4 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to weekly until such time as there are 4 consecutive operating weeks of no visible emissions.
- (3) The PTI application for these emissions units, P025 through P032, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X = 24" hours per day and "Y = 7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Ammonia

TLV (mg/m³): 17

Maximum Hourly Emission Rate (lbs/hr): 7.79

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

MAGLC (ug/m³): 410

The permittee, has demonstrated that emissions of ammonia, from emissions units P025 through P032, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final Permit to Install and Operate prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - e. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
 - (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) and d)(2) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. **Emission Limitation:**

Visible particulate emissions shall not exceed 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).
 - b. **Emission Limitation:**

Fugitive visible particulate emissions shall not exceed 10% opacity as a three-minute average.

Applicable Compliance Method:

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

PE shall not exceed 0.14 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

d. Emission Limitation:

PE shall not exceed 0.61 ton per rolling, 12-month period (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.

e. Emission Limitation:

VOC emissions shall not exceed 0.09 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

f. Emission Limitation:

VOC emissions shall not exceed 0.39 ton per rolling, 12-month period (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.

g. Emission Limitation:

Formaldehyde emissions shall not exceed 0.02 pound per hour (tool emissions stack)

Applicable Compliance Method:



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

h. Emission Limitation:

Formaldehyde emissions shall not exceed 0.09 ton per rolling, 12-month period (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.

i. Emission Limitation:

Phenol emissions shall not exceed 0.05 pound per hour (tool emissions stack)

Applicable Compliance Method:

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

j. Emission Limitation:

Phenol emissions shall not exceed 0.22 ton per rolling, 12-month period (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.

k. Emission Limitation:

PE shall not exceed 0.27 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

I. Emission Limitation:

PE shall not exceed 1.18 ton per rolling, 12-month period (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.

m. Emission Limitation:

VOC emissions shall not exceed 0.16 pound per hour (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). Alternate, USEPA approved test methods, may be used with prior written approval.

n. Emission Limitation:

VOC emissions shall not exceed 0.70 ton per rolling, 12-month period (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.

o. Emission Limitation:

Phenol emissions shall not exceed 0.01 pound per hour (press emissions stack)

Applicable Compliance Method:

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



p. Emission Limitation:

Phenol emissions shall not exceed 0.05 ton per rolling, 12-month period (press emissions stack)

Applicable Compliance Method:

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

q. Emission Limitation:

PE shall not exceed 0.06 ton per rolling, 12-month period (fugitive emissions)

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the permittee's estimate that up to 5% of the press emissions would be emitted as fugitive. Compliance with the visible emissions limitation of 10% opacity as a 3-minute will be considered to be adequate demonstration of compliance with the ton per rolling, 12-month period emission limitation..

r. Emission Limitation:

VOC emissions shall not exceed 0.04 ton per rolling, 12-month period (fugitive)

Applicable Compliance Method

This emissions limitation was established by the permittee to reflect the potential to emit for this emissions unit based on the permittee's estimate that up to 5% of the press emissions would be emitted as fugitive.

g) Miscellaneous Requirements

(1) None.