State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
CUYAHOGA COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 13-03846

DATE: 7/31/2001

Shiloh Industries MTD Automotive -- Clev
Eric Molesly
5389 West 130th Street
Cleveland, OH 441301094

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: **USEPA** **CBAPC**

OhioEPA

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 7/31/2001**
Terms and Conditions	**Effective Date: 7/31/2001**

FINAL PERMIT TO INSTALL 13-03846

Application Number:	13-03846
APS Premise Number:	1318452766
Permit Fee:	**$3200**
Name of Facility:	Shiloh Industries MTD Automotive -- Clev
Person to Contact:	Eric Molesly
Address:	5389 West 130th Street Cleveland, OH 441301094

Location of proposed air contaminant source(s) [emissions unit(s)]:
5389 West 130th Street
Cleveland, **Ohio**

Description of proposed emissions unit(s):
Blade lines numbers 1 and 2 -- P010 and P011.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PE	7.30
SO_2	0.026
NO_x	4.33
CO	0.92
VOC	0.85

Emissions Unit ID: **P010**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
P010 - Lawn mower blades hardening line #1 with the following activities and equipment:	OAC rule 3745-31-05(A)(3)
Natural gas burning activity to provide heat to cleaning and rinsing tanks, hot air dryer, 3-compartment rinse tank, and outlet hot dryer, with a total rating of 4.3 MM BTU/hr.	OAC rule 3745-17-10(B)(1)
	OAC rule 3745-17-07(A)(1)
Tank for rust inhibitor application activity unto metal blades	OAC rule 3745-31-05(A)(3)
High heat tank for the metal blades quenching activity	

	Applicable Emissions Limitations/Control Measures	
	PE: 0.10 lb/hr, 0.44 tpy SO_2: 0.0026 lb/hr, 0.011 tpy	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(A)(2)	NO_x: 0.43 lb/hr, 1.88 tpy CO: 0.09 lb/hr, 0.39 tpy VOC: 0.03 lb/hr, 0.13 tpy	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(B)(1)	Visible emissions from any stack servicing this emissions unit shall not exceed 5% percent opacity, as a six minute average.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)(3)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	VOC: 0.06 lb/hr, 0.265 tpy
OAC rule 3745-31-05(A)(3)	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 emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(U)(1)(i)	PE: 0.725 lb/hr, 3.175 tpy best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.a, and A.2.b) visible fugitive particulate emissions from the tanks servicing this emission unit shall not exceed 5% opacity, as a 3-minute average.	

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably available control measures to prevent fugitive dust emissions, and to assure compliance with the above-mentioned applicable requirements. If required, reasonable control measures may include the installation of hoods, fans, or other type of equipment to adequately enclose, contain, capture, vent and control fugitive dust generated by the process.

2.b Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month pertaining the high heat tank for quenching activity at this emissions unit:

   a. The name and identification number of the salt material used in this quenching tank.

   b. The following information must be recorded for the salt material used in this quenching tank:

      1. the total salt purchased for the quenching tank, pounds per month

      2. the total salt moisture content, (% per supplier)

      3. the total high heat tank salt used to fill the tank upon cleaning, pounds per month

      4. the total quench salt used to fill tank upon cleaning

      5. the total salt sludge removed for disposal, pounds per month

      6. the total salt carried over to rinse tank & discharged to sewer, pounds per month

      7. the salt solids collected from equipment deposition/spills, pounds per month

c. The total monthly operating hours for the high heat tank used for quenching, hours per month.

d. The particulate emissions from the high heat tank used for quenching, pounds per month.

2. The permittee shall collect and record the following information each month pertaining the rust inhibitor application activity for this emissions unit:

a. The name and identification number of each rust inhibitor material applied unto the lawn mower blades, as applied.

b. The following information must be recorded for each rust inhibitor material applied unto the
lawn mower blades:

1. the total volume of each rust inhibitor used, gallons per month

2. the total volume of each rust inhibitor used, gallons per year

3. the VOC content of each rust inhibitor used, pounds per gallon

c. The total monthly operating hours for the rust inhibitor application tank.

d. The VOC emissions from all the rust inhibitor material used in the rust inhibitor application
tank.

D. Reporting Requirements

1. For the natural gas burning activity associated with this emissions unit, the permittee shall submit semiannual deviation (excursion) reports to the Cleveland Bureau of Air Pollution Control (CBAPC) which identify each day during which the average hourly total emissions exceeded the following limitations: PE, 0.10 lbs/hr from natural gas combustion.

2. For the high heat tank for the metal blades quenching activity associated with this emission unit, the permittee shall submit semiannual deviation (excursion) reports to the CBAPC which identify each day during which the average hourly total particulate mist emissions exceeded 0.725 pounds per hour.

3. For the rust inhibitor application activity associated with this emissions unit, the permittee shall submit semiannual deviation (excursion) reports to the Cleveland Bureau of Air Pollution Control (CBAPC) which identify each day during which the average hourly total emissions exceeded the following limitations: 0.06 lbs/hr.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

1.a. Emission Limitation:
Natural gas burning activity

0.44 tpy PE
0.10 lb/hr PE

Compliance with the particulate emission limits shall be based on calculations using the appropriate emission factor (4.5 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 201, if required. Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.b. Emission Limitation:
Natural gas burning activity

0.011 tpy SO_2
0.0026 lb/hr SO_2

Applicable Compliance Method:

Compliance with the SO_2 emission limits shall be based on calculations using the appropriate emission factor (0.60 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 6, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.c. Emission Limitation:
Natural gas burning activity

1.88 tpy NO_x
0.43 lb/hr NO_x

Applicable Compliance Method:

Compliance with the NO_x emission limits shall be based on calculations using the appropriate emission factor (100 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 7, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.d. Emission Limitation:
Natural gas burning activity

0.39 tpy CO emissions
0.09 lbs/hr CO

Applicable Compliance Method:

Compliance with the CO emission limits shall be based on calculations using the appropriate emission factor (21 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 10, if

required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.e. Emission Limitation:
Natural gas burning activity

0.13 tpy VOC
0.03 lb/hr VOC

Applicable Compliance Method:

Compliance with the VOC emission limits shall be based on calculations using the appropriate emission factor (8.0 lb/1 $x10^6$ ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 25, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.f. Emission Limitation:
visible emissions from any stack

5% opacity as a 6-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with USEPA Method 9, 40 CFR part 60.

1.g. Emission Limitation:
High heat tank for quenching activity

3.175 tpy PE
0.73 lb/hr PE

Compliance with the PE emission limits shall be based on record keeping specified in Section C.7., and through the use of the following expression:

E = [(P) - (M) - (H) - (Q) - (S) - (C) - (D)] / [T]

where,

E = the particulate emissions from the high heat tank used for quenching, pounds per month

P = the total salt purchased for the quenching tank, pounds per month

M = the total salt moisture content, (% per supplier)

H = the total high heat tank salt used to fill the tank upon cleaning, pounds per month

Q = the total quench salt used to fill tank upon cleaning

S = the total salt sludge removed for disposal, pounds per month

C = the total salt carried over to rinse tank & discharged to sewer, pounds per month

D = the salt solids collected from equipment deposition/spills, pounds per month

T = the total monthly operating hours for the high heat tank used for quenching, hours per month.

Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the summation of the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.h. Emission Limitation:
Fugitive emissions from the metal blades quenching tank

5% opacity as a 3-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with USEPA Method 22, 40 CFR part 60.

1.i. Emission Limitation:
Rust inhibitor application activity

0.265 tpy VOC
0.06 lb/hr VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in Section C, and using the following expression:

E = [(D) x (Q)]/ (T)

where:

E = total VOC emissions, lb/hr
D = VOC content of the rust inhibitor as applied, lb/gallon
Q = total rust inhibitor usage, gallon/month
T = total operating schedule, hour/month

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the summation of the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

F. Miscellaneous Requirements

1. None

Emissions Unit ID: **P011**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment		Applicable Rules/Requirements
P011 - Lawn mower blades hardening line #2 with the following activities and equipment:		OAC rule 3745-31-05(A)(3)
Natural gas burning activity to provide heat to preheating oven, high heat tank, washing tank, and hot rinsing tank, with a total rating of 5.6 MM BTU/hr.		OAC rule 3745-17-10(B)(1)
		OAC rule 3745-17-07(A)(1)
	Tank for rust inhibitor application activity unto the metal blades	
High heat tank for the metal blades quenching activity		OAC rule 3745-31-05(A)(3)

	Applicable Emissions Limitations/Control Measures	this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(A)(2)	PE: 0.11 lb/hr, 0.50 tpy SO_2: 0.0034 lb/hr, 0.015 tpy NO_x: 0.56 lb/hr, 2.45 tpy CO: 0.12 lb/hr, 0.53 tpy VOC: 0.04 lb/hr, 0.18 tpy	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(B)(1)	Visible emissions from any stack servicing this emissions unit shall not exceed 5% percent opacity, as a six minute average.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)(3)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	VOC: 0.06 lb/hr, 0.265 tpy The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(A)(3)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
OAC rule 3745-21-09(U)(1)(i)	PE: 0.725 lb/hr, 3.175 tpy best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.a, and A.2.b)	
	visible fugitive particulate emissions from the tanks servicing this emission unit shall not exceed 5% opacity, as a 3-minute average.	
	The emission limitation specified by	

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably available control measures to prevent fugitive dust emissions, and to assure compliance with the above-mentioned applicable requirements. If required, reasonable control measures may include the installation of hoods, fans, or other type of equipment to adequately enclose, contain, capture, vent and control fugitive dust generated by the process.

2.b Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month pertaining the high heat tank for quenching activity at this emissions unit:

   a. The name and identification number of the salt material used in this quenching tank.

   b. The following information must be recorded for the salt material used in this quenching tank:

      1. the total salt purchased for the quenching tank, pounds per month

      2. the total salt moisture content, (% per supplier)

      3. the total high heat tank salt used to fill the tank upon cleaning, pounds per month

      4. the total quench salt used to fill tank upon cleaning

      5. the total salt sludge removed for disposal, pounds per month

      6. the total salt carried over to rinse tank & discharged to sewer, pounds per month

      7. the salt solids collected from equipment deposition/spills, pounds per month

c. The total monthly operating hours for the high heat tank used for quenching, hours per month.

d. The particulate emissions from the high heat tank used for quenching, pounds per month.

2. The permittee shall collect and record the following information each month pertaining the rust inhibitor application activity for this emissions unit:

a. The name and identification number of each rust inhibitor material applied unto the lawn mower blades, as applied

b. The following information must be recorded for each rust inhibitor material applied unto the lawn mower blades:

1. the total volume of each rust inhibitor used, gallons per month

2. the total volume of each rust inhibitor used, gallons per year

3. the VOC content of each rust inhibitor used, pounds per gallon

c. The total monthly operating hours for the rust inhibitor application tank.

d. The VOC emissions from all the rust inhibitor material used in the rust inhibitor application tank.

D. Reporting Requirements

1. For the natural gas burning activity associated with this emissions unit, the permittee shall submit semiannual deviation (excursion) reports to the Cleveland Bureau of Air Pollution Control (CBAPC) which identify each day during which the average hourly total emissions exceeded the following limitations: PE, 0.11 lb/hr from natural gas combustion.

2. For the high heat tank for the metal blades quenching activity associated with this emission unit, the permittee shall submit semiannual deviation (excursion) reports to the CBAPC which identify each day during which the average hourly total particulate mist emissions exceeded 0.725 pounds per hour

3. For the rust inhibitor application activity associated with this emissions unit, the permittee shall submit semiannual deviation (excursion) reports to the Cleveland Bureau of Air Pollution Control (CBAPC) which identify each day during which the average hourly total emissions exceeded the following limitations: 0.06 lbs/hr.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

1.a. Emission Limitation:
Natural gas burning activity

0.50 tpy PE
0.11 lb/hr PE

Compliance with the PE emission limits shall be based on calculations using the appropriate emission factor (4.5 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance

with 40 CFR Part 60, Appendix A, Method 201, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.b. Emission Limitation:
Natural gas burning activity

0.015 tpy SO_2
0.0034 lb/hr SO_2

Applicable Compliance Method:

Compliance with the SO_2 emission limits shall be based on calculations using the appropriate emission factor (0.60 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 6, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.c. Emission Limitation:
Natural gas burning activity

2.45 tpy NO_x
0.56 lb/hr NO_x

Applicable Compliance Method:

Compliance with the NO_x emission limits shall be based on calculations using the appropriate emission factor (100 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 7, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.d. Emission Limitation:
Natural gas burning activity

0.53 tpy CO emissions
0.12 lbs/hr CO

Applicable Compliance Method:

Emissions Unit ID: **P011**

Compliance with the CO emission limits shall be based on calculations using the appropriate emission factor (21 lb/1x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 10, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.e. Emission Limitation:
Natural gas burning activity

0.18 tpy VOC
0.04 lb/hr VOC

Applicable Compliance Method:

Compliance with the VOC emission limits shall be based on calculations using the appropriate emission factor (8.0 lb/1 x10^6 ft^3) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft^3, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 25, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.f. Emission Limitation:
visible emissions from any stack

5% opacity as a 6-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with USEPA Method 9, 40 CFR part 60.

1.g. Emission Limitation:
High heat tank for quenching activity

3.175 tpy PE
0.73 lb/hr PE

Compliance with the PE emission limits shall be based on record keeping specified in Section C.7., and through the use of the following expression:

E = [(P) - (M) - (H) - (Q) - (S) - (C) - (D)] /[T]

where,

E = the particulate emissions from the high heat tank used for quenching, pounds per month

P = the total salt purchased for the quenching tank, pounds per month

M = the total salt moisture content, (% per supplier)

H = the total high heat tank salt used to fill the tank upon cleaning, pounds per month

Q = the total quench salt used to fill tank upon cleaning

S = the total salt sludge removed for disposal, pounds per month

C = the total salt carried over to rinse tank & discharged to sewer, pounds per month

D = the salt solids collected from equipment deposition/spills, pounds per month

T = the total monthly operating hours for the high heat tank used for quenching, hours per month.

Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the summation of the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

1.h. Emission Limitation:
Fugitive emissions from the metal blades quenching tank

5% opacity as a 3-minute average

Applicable Compliance Method:
Compliance shall be determined in accordance with USEPA Method 22, 40 CFR part 60.

1.i. Emission Limitation:
Rust inhibitor application activity

0.265 tpy VOC
0.06 lb/hr VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in Section C, and using the following expression:

E = [(D) x (Q)]/ (T)

where:

E = total VOC emissions, lb/hr
D = VOC content of the rust inhibitor as applied, lb/gallon
Q = total rust inhibitor usage, gallon/month
T = total operating schedule, hour/month

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the summation of the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

F. Miscellaneous Requirements

1. None

NEW SOURCE REVIEW FORM B

PTI Number: 13-03846 Facility ID: 1318452766

FACILITY NAME

FACILITY DESCRIPTION Shiloh Industries MTD Automotive CITY/TWP Cleveland

SIC CODE 3465 SCC CODE EMISSIONS UNIT ID P010

EMISSIONS UNIT DESCRIPTION Lawn mower blades hardening line #1

DATE INSTALLED December 1991

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.745	2.72	0.825	3.62
PM_{10}					
Sulfur Dioxide	Attainment	0.0046	0.0095	0.0026	0.011
Organic Compounds	Attainment	0.09	0.33	0.09	0.39
Nitrogen Oxides	Attainment	0.43	1.57	0.43	1.88
Carbon Monoxide	Attainment	0.09	0.33	0.09	0.39
Lead					
Other					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination: Engineering analysis and knowledge of the process.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 13-03846 Facility ID: 1318452766

FACILITY NAME

FACILITY DESCRIPTION Shiloh Industries MTD Automotive CITY/TWP Cleveland

Emissions Unit ID: **P011**

SIC CODE 3465 SCC CODE EMISSIONS UNIT ID P011

EMISSIONS UNIT DESCRIPTION Lawn mower blades hardening line #2

DATE INSTALLED December 1991

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.755	2.76	0.835	3.68
PM_{10}					
Sulfur Dioxide	Attainment	0.0034	0.012	0.0034	0.015
Organic Compounds	Attainment	0.10	0.37	0.10	0.45
Nitrogen Oxides	Attainment	0.56	2.04	0.56	2.45
Carbon Monoxide	Attainment	0.12	0.44	0.12	0.53
Lead					
Other:					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination: Engineering analysis and knowledge of the process.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

28 **NEW SOURCE REVIEW FORM B**

PTI Number: 13-03846 Facility ID: 1318452766

FACILITY NAME

FACILITY DESCRIPTION Shiloh Industries MTD Automotive CITY/TWP Cleveland

Emissions Unit ID: **P011**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	1303846**c**.wpd	☐	
Modeling form/results	☐	0000000**s**.wpd	☐	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☐
BAT Study	☐	0000000**b.**wpd	☐	☐
Other/misc.	☐	0000000**t**.wpd	☐	☐

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	**Tons Per Year**

NEW SOURCE REVIEW FORM B

PTI Number: 13-03846 Facility ID: 1318452766

FACILITY NAME

FACILITY DESCRIPTION Shiloh Industries MTD Automotive CITY/TWP Cleveland

Emissions Unit ID: **P011**

PE	7.30
SO_2	0.026
NO_x	4.33
CO	0.92
VOC	0.85