

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
Company Name	Mansfield Plumbing Products LLC - China Division
Premise Number	0303000002
What makes this facility a Title V facility?	PE, CO and SO <sub>2</sub>
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A



Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1		40 CFR, Part 64	States applicability of CAM rule.
A.2	77-07		Lists insignificant emission units subject to a PTI and/or one or more applicable requirements.

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745- )	Other												
P002, P003, P010, P011, P016, P018, P028, P033, P043, P047, P048	Exempt	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P004, P041, P042, P045, P046	Visible PE shall not exceed 20% opacity, as a 6-minute, except as otherwise provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P002, P003, P010, P011, P016, P018, P028, P033, P043, P047, P048	Exempt	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P041, P042, P045	None	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P004	5.22 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum quantity of glaze employed, density of glaze, maximum solids content, a transfer efficiency of 93.2% and a control efficiency of 90% are sufficient to show compliance.
P046	5.54 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum quantity of glaze employed, density of glaze, maximum solids content, a transfer efficiency of 99.36% and a control efficiency of 98% are sufficient to show compliance.
P016, P018	Exempt	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P028	None	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.04 tons per year and was based on the maximum hourly fuel usage rate of 0.0098 (MMCF), an emission factor from AP-42, Table 1.4-3 & 4 (7/98) of 0.6 lb/10 <sup>6</sup> scf, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P033	None	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.09 ton per year and was based on the maximum hourly process capacity of 0.50 tons, an emission factor from AP-42, Table 11.7-1 (7/96) of 0.045 lbs SO2/ton, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P047	None	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P048	None	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.05 tons per year and was based on the maximum hourly fuel usage rate of 0.0187 (MMCF), an emission factor from AP-42, Table 1.4-3 & 4 (7/98) of 0.6 lb/10 <sup>6</sup> scf, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P043	None	18-06(E)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 1.10 tons per year and was based on the maximum hourly process capacity of 5.50 tons, an emission factor from AP-42, Table 11.7-1 (7/96) of 0.045 lbs SO2/ton, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P028, P033, P043, P047, P048	None	21-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>ND-The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.</p> <p>On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.</p> <p>M, R, Rp &amp; ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.</p>
P028	0.98 lb NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.</p> <p>ET-Calculations based on maximum hourly natural gas usage and the appropriate emission factor are sufficient to show compliance.</p>
P028	4.29 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.</p> <p>ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.</p>
P028	0.82 lb Co/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.</p> <p>ET-Calculations based on maximum hourly natural gas usage and the appropriate emission factor are sufficient to show compliance.</p>

P028	3.61 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P028, P033, P043, P047, P048	Visible PE shall not exceed 20% opacity, as a 6-minute average.	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A COM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P033	1.65 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly process weight rate and the appropriate emission factor are sufficient to show compliance.
P033	7.23 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P041	0.17 lb PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly amount of plaster unloaded, the appropriate emission factor and a control efficiency of 99.8% are sufficient to show compliance.
P041	0.74 ton PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

P042, P045	1.32 lbs PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of baffles and water curtain. Monitoring includes records of time when baffles and water curtain are not in use when emission unit is operational. A CEM is not economically justified. CAM is applicable. ET-Calculations based on maximum quantity of glaze employed, density of glaze, maximum solids content, a transfer efficiency of 86% and a control efficiency of 99% are sufficient to show compliance.
P042, P045	5.8 tons PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of baffles and water curtain. Monitoring includes records of time when baffles and water curtain are not in use when emission unit is operational. A CEM is not economically justified. CAM is applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P043	2.70 lbs PM10/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly process weight rate and the appropriate emission factor are sufficient to show compliance.
P043	11.83 tons PM/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P043	2.42 lbs NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly process weight rate and the appropriate emission factor are sufficient to show compliance.

P043	10.60 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P043	18.2 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly process weight rate and the appropriate emission factor are sufficient to show compliance.
P043	79.72 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P043	2.37 lbs OC/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly process weight rate and the appropriate emission factor are sufficient to show compliance.
P043	10.38 tons OC/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P047	11.81 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly process weight rate and the appropriate emission factor are sufficient to show compliance.

P047	51.73 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P047	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	Other-ORC 3704.03(T)(4) ND-The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxide (NOx), organic compound (OC) particulate matter less than 10 microns in size (PM10), and sulfur dioxide (SO2) emissions from this air contaminant source since the uncontrolled potential to emit (PTE) for these pollutants is less than ten tons per year.  The PTE for NOx from this emissions unit is 6.92 tons per year, the PTE for OC is 6.75 tons per year, the PTE for PM10 is 7.67 tons per year and the PTE for SO2 is 0.70 ton per year. The PTE for these pollutants is based on the maximum hourly process capacity of 3.58 tons, a maximum operating schedule of 8760 hours per year, a conversion factor of 1 ton per 2000 lbs and the following emission factors:  0.44 lb NOx/ton (based on vendor data) 0.43 lb OC/ton [based on AP-42, Table 11.7-1 (7/96)] 0.49 lb PE/ton* [based on AP-42, Table 11.7-1 (7/96)] 0.045 lb SO2/ton [based on AP-42, Table 11.7-1 (7/96)] *All PE are assumed to be PM10 M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P048	1.87 lbs NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly natural gas usage and the appropriate emission factor are sufficient to show compliance.

P048	8.20 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P048	1.57 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly natural gas usage and the appropriate emission factor are sufficient to show compliance.
P048	6.88 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

**C Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

**C Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.