



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

04/30/07

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77  
permit**

03-03-00-0166  
Mansfield Plumbing Products, Inc., Trim Division  
Michael Ray Fusek Mr.  
150 East First Street  
Perrysville, OH 44864

Dear Michael Ray Fusek:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall  
Permit Review/Development Section  
Ohio EPA, Division of Air Pollution Control  
122 South Front Street  
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northwest District Office.

Sincerely,

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

cc: USEPA (electronically submitted)  
File, DAPC PIER  
Northwest District Office



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 04/30/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-03-00-0166 to:  
**Mansfield Plumbing Products, Inc., Trim Division**  
 150 East First Street  
 Perrysville, OH 44864

**Emissions Unit ID (Company ID)/Emissions Unit Activity Description**

P029 (Sand System / Muller) Sand System - includes conveyors, hoppers, muller, and sand recycler	P901 (Harrison Pouring Line) Harrison Pouring Line (Previously identified as Z001)	Coreless Inductotherm Furnace (previously P044, modified under PT1 #03-13319)
P032 (Sand Silo) Sand Silo	P902 (Taccone shakeout) Taccone shakeout (Previously identified as Z004)	P905 (Ajax Brass Induction Furnace) New AJAX Brass Induction Furnace
P034 (7.5 Hp Grinder) 7.5 Hp Grinder	P903 (Harrison Shakeout) Harrison shakeout (Previously identified as Z005)	P906 (Taccone Pouring Line) Taccone Pouring Line (previously P044)
P035 (42" Ball Mill) 42" Ball Mill	P904 (Coreless Inductotherm Furnace)	P907 (Wheelabrator) Wheelabrator (formerly P019)

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office  
 347 North Dunbridge Road  
 Bowling Green, OH 43402  
 (419) 352-8461

Ohio Environmental Protection Agency

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Chris Korleski  
 Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.  
(*Authority for term: OAC rule 3745-77-07(A)(3)(b)(i)*)

b. 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 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.  
(*Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii)*)

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**7. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).  
*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.  
*(Authority for term: OAC rule 3745-77-07(G))*

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.  
*(Authority for term: OAC rule 3745-77-07(I))*

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.  
*(This term is provided for informational purposes only.)*

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**19. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**20. 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.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.  
(Authority for term: OAC rule 3745-77-01)

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

**B. *State Only Enforceable Section***

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

**2. 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.

**3. 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.

**4. 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).

**5. 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.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

1. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions unit P029 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR Part 64]

2. The following insignificant emissions units are located at this facility:

B007 - brass air make-up unit;  
P007 - pouring ladle preheater;  
P024 - Shalco core blow machine;  
Z003 - cut-off saws; and  
Z008 - charge handling.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

### **B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P045 - brass vacuum system;  
Z002 - brass vacuum system;  
Z006 - Taccone mold making line; and  
Z007 - Harrison mold making line.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Sand System / Muller (P029)

**Activity Description:** Sand System - includes conveyors, hoppers, muller, and sand recycler

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/ Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
50 tons/hr sand muller, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	20.8 lbs PE/hr
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See A.III. and A.IV.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 2 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64.3(a)]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

3. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(b)]

4. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(e)]

### III. Monitoring and/or Record Keeping Requirements (continued)

5. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- checking the bags / filters for deterioration or degradation;
  - checking the cleaning system for proper operation; and
  - checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- filter bags;
  - timing boards and solenoid coils (for blow down function);
  - diaphragms and diaphragm seal kits;
  - spare set of belts; and
  - spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(d)]

### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(a) and 40 CFR, Part 64.9(a)]

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

- 1.a** Emission Limitation: Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method: The method to be employed to demonstrate compliance with the VE limitation shall be OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-074(C)(1)]

- 1.b** Emission Limitation: 20.8 lbs PE/hour

Applicable Compliance Method: The permittee may demonstrate compliance with this emission limitation by multiplying the maximum process weight rate (50 tons/hour) by the emission factor from AP-42, Table 12.10-7 (revised 1/95) of 0.20 pound PE/ton\*.

If required, the method to be employed to demonstrate compliance with the emission limitation shall be OAC rule 3745-17-03(B)(10).

\* The baghouse control efficiency is accounted for in this emission factor.

[OAC rule 3745-77-074(C)(1)]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 TPH sand muller, with baghouse	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Sand Silo (P032)  
**Activity Description:** Sand Silo

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sand storage silo, with baghouse	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05 (PTI #03-4517, issued 9/27/89)	0.02 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-3 county.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 2 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1)]

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation: 0.02 lb PE/hour

Applicable Compliance Method: Compliance may be determined by multiplying maximum process weight rate (3000 pounds/hour) by the Source Classification Code document (SCC # 3-04-003-50) emission factor (0.65 pound PE/1000 pounds), and then multiplying this value by the estimated baghouse control factor (1-.99)\*.

If required, the methods to be employed to demonstrate compliance with the emission limitation shall be Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

\* The control efficiency of the baghouse is estimated at 99%.

[OAC rule 3745-77-074(C)(1) and PTI #03-4517]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sand storage silo, with baghouse	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** 7.5 Hp Grinder (P034)  
**Activity Description:** 7.5 Hp Grinder

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
0.5 ton/hr grinder, with baghouse	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05 (PTI #03-4517, issued 9/27/89)	0.10 lb particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-3 county.

##### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 2 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1)]

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation: 0.10 pound PE/hour

Applicable Compliance Method: Compliance may be determined by multiplying the maximum process weight rate (0.5 ton/hour) by the emission factor from AP-42, Table 12.10-7 (revised 1/95) of 15.5 pounds PE/ton, and then multiplying this value by the estimated baghouse control factor (1-.99)\*.

If required, the methods to be employed to demonstrate compliance with the emission limitation shall be Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

\* The control efficiency of the baghouse is estimated at 99%.

[OAC rule 3745-77-074(C)(1) and PTI #03-4517]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
0.5 TPH grinder, with baghouse	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** 42" Ball Mill (P035)  
**Activity Description:** 42" Ball Mill

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1 ton/hr ball mill, with baghouse	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05 (PTI #03-4517, issued 9/27/89)	0.41 pound particulate emissions (PE)/hour

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-3 county.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 2 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1)]

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation: 0.41 lb PE/hour

Applicable Compliance Method: Compliance may be determined by multiplying the maximum process weight rate (1 ton/hour) by the estimated percentage of pigment emitted (0.005), and then multiplying this value by the estimated baghouse control factor (1-.99)\*.

If required, the methods to be employed to demonstrate compliance with the emission limitation shall be Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

\* The control efficiency of the baghouse is estimated at 99%.

[OAC rule 3745-77-074(C)(1) and PTI #03-4517]

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1 TPH ball mill, with baghouse	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Harrison Pouring Line (P901)  
**Activity Description:** Harrison Pouring Line (Previously identified as Z001)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Harrison pouring line	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(B)	none (See A.I.2.b.)
	OAC rule 3745-17-08(B)	none (See A.I.2.c.)
	OAC rule 3745-17-11(B)	none (See A.I.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08(B) is not applicable.
- 2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Ashland County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.d The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-2 county.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

None

##### IV. Reporting Requirements

None

##### V. Testing Requirements

None

Facility Name: **Mansfield Plumbing Products LLC - Trim Division**  
Facility ID: **03-03-00-0166**  
Emissions Unit: **Harrison Pouring Line (P901)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Harrison pouring line	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Taccone shakeout (P902)  
**Activity Description:** Taccone shakeout (Previously identified as Z004)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Taccone shakeout	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(B)	none (See A.I.2.b.)
	OAC rule 3745-17-08(B)	none (See A.I.2.c.)
	OAC rule 3745-17-11(B)	none (See A.I.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08(B) is not applicable.
- 2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Ashland County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.d The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-2 county.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

None

##### IV. Reporting Requirements

None

##### V. Testing Requirements

None

Facility Name: **Mansfield Plumbing Products LLC - Trim Division**  
Facility ID: **03-03-00-0166**  
Emissions Unit: **Taccone shakeout (P902)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Taccone shakeout	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Harrison Shakeout (P903)  
**Activity Description:** Harrison shakeout (Previously identified as Z005)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Harrison shakeout	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(B)	none (See A.I.2.b.)
	OAC rule 3745-17-08(B)	none (See A.I.2.c.)
	OAC rule 3745-17-11(B)	none (See A.I.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08(B) is not applicable.
- 2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Ashland County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.d The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-2 county.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

None

##### IV. Reporting Requirements

None

##### V. Testing Requirements

None

Facility Name: **Mansfield Plumbing Products LLC - Trim Division**  
Facility ID: **03-03-00-0166**  
Emissions Unit: **Harrison Shakeout (P903)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Harrison shakeout	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Coreless Inductotherm Furnace (P904)

**Activity Description:** Coreless Inductotherm Furnace (previously P044, modified under PTI #03-13319)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1 ton/hour brass electric induction furnace	OAC rule 3745-31-05(A)(3) [PTI #03-13319, issued 9/19/02]	0.76 pound stack particulate emissions (PE)/hour
		3.33 tons PE/year (stack emissions)
		0.04 pound fugitive PE/hour
		0.18 ton fugitive PE/year
		Visible PE shall not exceed 20% opacity, as a six-minute average.
		Visible fugitive PE shall not exceed 20% opacity, as a three-minute average.
		0.053 pound stack lead (Pb)/hour
		0.23 ton Pb/year (stack emissions)
		0.003 pound fugitive Pb/hour
		0.013 ton Pb (fugitive)/year
	OAC rule 3745-17-07(A)	See A.1.2.a.
	OAC rule 3745-17-07(B)	none (refer to section A.1.2.b.)
	OAC rule 3745-17-08(B)	none (refer to section A.1.2.c.)
	OAC rule 3745-17-11(B)	none (refer to section A.1.2.d.)
		none (refer to section A.1.2.e.)

## 2. Additional Terms and Conditions

- 2.a The 0.76 pound stack PE/hour, 3.33 tons PE/year, 0.04 pound fugitive PE/hour, 0.18 ton fugitive PE/year, 0.053 pound stack Pb/hour, 0.23 ton Pb/year, 0.003 pound fugitive Pb/hour and 0.013 ton fugitive Pb/year emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08(B) is not applicable.
- 2.d This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Ashland County). Therefore, the requirements of OAC rule 3745-17-08(A) and 3745-17-08(B) do not apply to this emissions unit.
- 2.e The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-2 county.

## II. Operational Restrictions

- 1. The total lead content of the brass melted in this emissions unit shall not exceed 7 percent (by weight).  
[OAC rule 3745-77-07(A)(1) and PTI #03-13319]

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 eliminate the visible emissions.[OAC rule 3745-77-07(C)(1) and PTI #03-13319]
- 2. The permittee shall maintain records, from the ingot supplier, documenting the lead concentration (percent by weight) of the brass ingots charged in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

## IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of all exceedances of the restriction on the lead weight percent in brass. The notifications shall be submitted to the Director within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

#### IV. Reporting Requirements (continued)

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 1.a Emission Limitations: 0.76 pound stack PE/hour, 3.33 tons stack PE/year

Applicable Compliance Method: The permittee may demonstrate compliance with this emission limitation by multiplying the maximum process weight rate (1.0 ton/hour) by the emission factor from AP-42 Table 12.10-3 (revised 1/95) of 0.9 pound PE/ton. This value is then multiplied by 0.85 (85% of the emissions are exhausted through the stack).

The annual emission limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the test methods to be employed to demonstrate compliance with this emission limitation shall be Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

- 1.b Emission Limitations: 0.04 pound fugitive PE/hour, 0.18 ton fugitive PE/year

Applicable Compliance Method: The permittee may demonstrate compliance with this emission limitation by multiplying the maximum process weight rate (1.0 ton/hour) by the emission factor from AP-42 Table 12.10-3 (revised 1/95) of 0.9 pound PE/ton. This value is then multiplied by 0.15 (15% of the emissions are exhausted through the stack).

The annual emission limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

- 1.c Emission Limitations: 0.053 pound stack Pb/hour, 0.23 ton stack Pb/year

Applicable Compliance Method: The permittee may demonstrate compliance with this emission limitation by multiplying the maximum lead content of the brass (7%) by the maximum stack PE rate (0.76 pound/hour and 3.33 tons/year).

The annual emission limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the test method to be employed to demonstrate compliance with this hourly emission limitation shall be Method 12 or 29, which is located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

## **V. Testing Requirements (continued)**

- 1.d** Emission Limitations: 0.003 pound fugitive Pb/hour, 0.013 ton fugitive Pb/year

Applicable Compliance Method: The permittee may demonstrate compliance with this emission limitation by multiplying the maximum lead content of the brass (7%) by the maximum fugitive PE rate (0.04 pound/hour and 0.18 ton/year).

The annual emission limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

- 1.e** Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method: If required, the test method to be employed to demonstrate compliance with this emission limitation shall be Method 9, which is located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

- 1.f** Emission Limitation: Visible fugitive PE shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method: If required, the test method to be employed to demonstrate compliance with this emission limitation shall be Method 22, which is located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13319]

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1 ton/hr brass electric induction furnace	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

- Pursuant to Engineering Guide #69, modeling to demonstrate compliance with Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[OAC rule 3745-77-07(A)(1) and PTI #03-13319]

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Ajax Brass Induction Furnace (P905)  
**Activity Description:** New AJAX Brass Induction Furnace

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ajax electric brass induction furnace	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-07(B)	See A.I.2.b.
	OAC rule 3745-17-08(B)	See A.I.2.c.
	OAC rule 3745-17-11(B)	See A.I.2.d.
	OAC rule 3745-31-05(A)(3) (PTI #03-13981, issued 9/20/05)	stack emissions: 5.22 lbs particulate emissions (PE)/hr  0.18 lb lead/hr  There shall be no visible fugitive emissions from the building enclosure that are associated with this emissions unit.  Visible PE from the stacks shall not exceed 10% opacity, as a six-minute average.
	OAC rule 3745-31-05(C) (PTI #03-13981, issued 9/20/05)	See A.I.2.e. and A.I.2.f. fugitive emissions: 0.94 ton PE per rolling, 12-month period  0.03 ton lead per rolling, 12-month period  stack emissions: 8.48 tons PE per rolling, 12-month period  0.30 ton lead per rolling, 12-month period
		See A.I.2.g.

## **2. Additional Terms and Conditions**

- 2.a** This emissions unit is 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.
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B), pursuant to OAC rule 3745-17-07 (B)(11)(e), because the emissions unit is not subject to the requirements of OAC rule 3745-17-08 (A).
- 2.c** Mansfield Plumbing Products is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B)(1).
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Ashland County.
- 2.e** All particulate emissions are considered to be particulate matter less than 10 microns in size (PM10).
- 2.f** Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the Terms and Conditions of this permit, a building enclosure, and the use of brass ingots with a lead concentration not greater than 7%, by weight.
- 2.g** The permittee has requested federally enforceable emission limitations for their electric induction furnace of 0.94 ton fugitive PE, 8.48 tons stack PE, 0.03 ton fugitive lead, and 0.30 ton stack lead per rolling, 12-month period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.

## **II. Operational Restrictions**

- 1.** The maximum annual brass throughput rate for this emissions unit shall not exceed 6,500 tons per rolling, 12-month period.  
[OAC rule 3745-77-07(A)(1) and PTI #03-13981]
- 2.** The permittee shall only charge clean brass ingots, which have a lead concentration of no more than 7%, by weight, in this emissions unit. In addition, the permittee may reprocess gates, risers, casting cutoffs, etc. that are generated in plant.  
[OAC rule 3745-77-07(A)(1) and PTI #03-13981]

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly records:
  - a. Brass throughput, in tons per month;
  - b. Fugitive PE using the company-supplied emission factor of 2.90 tons PE/ton brass, with an applied 10% fugitive loss;
  - c. Stack PE using the company-supplied emission factor of 2.90 tons PE/ton brass, with an applied 90% capture efficiency;
  - d. Fugitive lead emissions using the company-supplied emission factor of 0.10 ton lead/ton brass with an applied 10% fugitive loss;
  - e. Stack lead emissions using the company-supplied emission factor of 0.10 ton lead/ton brass, with an applied 90% capture efficiency; and
  - f. The rolling, 12-month brass throughput rate, fugitive and stack PE emission rates and, fugitive and stack lead emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

2. The permittee shall maintain records, from the ingot supplier, documenting the lead concentration (percent by weight) of the brass ingots charged in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, 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 fugitive 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 eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

### III. Monitoring and/or Record Keeping Requirements (continued)

4. 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 stack 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 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 eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of brass ingots with a lead concentration greater than 7%, by weight. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

2. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the following rolling, 12-month limitations:
  - a. Brass throughput of 6,500 tons
  - b. 0.94 ton fugitive PE;
  - c. 8.48 tons stack PE;
  - d. 0.03 ton fugitive lead; and
  - e. 0.30 ton stack lead.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

4. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: stack emissions - 5.22 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the emission unit's \*potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are required to demonstrate compliance.

If required, the test methods to be employed to demonstrate compliance with this emission limitation shall be Methods 1 - 5, which is located in 40 CFR, Part 60, Appendix A.

\*The hourly potential to emit was developed by multiplying the company supplied emission factor of 2.90 lbs PE/ton brass by the maximum throughput of 2.0 tons brass/hr, with an applied capture efficiency of 90%.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

1.b Emission Limitation: stack emissions - 0.18 lb lead/hr

Applicable Compliance Method: The hourly emission limitation represents the emission unit's \*potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are required to demonstrate compliance.

If required, the test methods to be employed to demonstrate compliance with this hourly emission limitation shall be Methods 12 or 29, which is located in 40 CFR, Part 60, Appendix A.

\*The hourly potential to emit was developed by multiplying the company supplied emission factor of 0.10 lb Pb/ton brass by the maximum throughput of 2.0 tons brass/hr, with an applied capture efficiency of 90%.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

1.c Emission Limitation: fugitive emissions - 0.94 ton PE/yr

Applicable Compliance Method: This emission limitation was developed by multiplying the company-supplied emission factor of 2.90 lbs PE/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied fugitive loss of 10%.

Compliance with this emission limitation shall be demonstrated in accordance with the record keeping requirements specified in Section A.III of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

1.d Emission Limitation: fugitive emissions - 0.03 ton lead/yr

Applicable Compliance Method: This emission limitation was developed by multiplying the company-supplied emission factor of 0.10 lb Pb/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied fugitive loss of 10%.

Compliance with this emission limitation shall be demonstrated in accordance with the record keeping requirements specified in Section A.III of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

## **V. Testing Requirements (continued)**

**1.e** Emission Limitation: stack emissions - 8.48 tons PE/yr

Applicable Compliance Method: The annual emission limitation was developed by multiplying the company-supplied emission factor of 2.90 lbs PE/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied capture efficiency of 90%.

Compliance with this emission limitation shall be demonstrated in accordance with the record keeping requirements specified in Section A.III of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

**1.f** Emission Limitation: stack emissions - 0.30 ton lead/yr

Applicable Compliance Method: The annual emission limitation was developed by multiplying the company-supplied emission factor of 0.10 lb Pb/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied capture efficiency of 90%.

Compliance with this emission limitation shall be demonstrated in accordance with the record keeping requirements specified in Section A.III of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

**1.g** Emission Limitation: There shall be no visible fugitive emissions from the building enclosure that are associated with this emissions unit.

Applicable Compliance Method: Compliance with the fugitive emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

**1.h** Emission Limitation: Visible particulate emissions from the stacks shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method: Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13981]

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ajax electric brass induction furnace	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Taccone Pouring Line (P906)  
**Activity Description:** Taccone Pouring Line (previously P044)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Taccone pouring line	OAC rule 3745-17-07(A)	none (refer to section A.1.2.a of the terms and conditions of this permit)
	OAC rule 3745-17-07(B)	none (refer to section A.1.2.b of the terms and conditions of this permit)
	OAC rule 3745-17-08(B)	none (refer to section A.1.2.c of the terms and conditions of this permit)
	OAC rule 3745-17-11(B)	none (refer to section A.1.2.d of the terms and conditions of this permit)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08(B) is not applicable.
- 2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Ashland County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.d The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Ashland County, which is identified as a P-2 county.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

None

##### IV. Reporting Requirements

None

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2 tons/hr Taccone pouring line	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Wheelabrator (P907)  
**Activity Description:** Wheelabrator (formerly P019)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1 ton/hr shot blast machine, with baghouse	OAC rule 3745-31-05(A)(3) [PTI #03-17222, issued 1/25/07]	0.88 ton fugitive particulate emissions (PE)/yr  Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.  See A.I.2.a.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)	See A.I.2.b.
	OAC rule 3745-17-08(B)	See A.I.2.c.
	OAC rule 3745-17-11(B)	3.40 lbs PE/hr

##### 2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with a 90% control efficiency for PE and includes compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-10(B)(1).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Ashland County). Therefore, the requirements of OAC rule 3745-17-08(A) and 3745-17-08(B) do not apply to this emissions unit.

##### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 2 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-01(C)(1) and PTI #03-17222]

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, 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 fugitive 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.

[OAC rule 3745-77-01(C)(1) and PTI #03-17222]

#### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-01(C)(1) and PTI #03-17222]

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-01(C)(1) and PTI #03-17222]

#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation: 0.88 ton fugitive PE/yr

Applicable Compliance Method: The tons of fugitive PE/yr limitation was developed by multiplying the FIRES database, Version 6.25, SCC 3-04-003-40 emission factor of 17 lbs PE/ton, the maximum hourly throughput rate of 1 ton/hr, the capture efficiency of 96% (1-0.96), the control efficiency of 70% (1-0.70) and the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton.

- 1.b Emission Limitation: Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method: The permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- 1.c Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method: The method to be employed to demonstrate compliance with the VE limitation shall be OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

**1.d** Emission Limitation: 3.40 lbs PE/hr

Applicable Compliance Method: The permittee may demonstrate compliance with this emission limitation by multiplying the maximum process weight rate (1 ton/hour) by the emission factor from the FIRES database, Version 6.25, SCC 3-04-003-40 of 17 pounds PE/ton, and then multiplying this value by a control factor of (1-.99)\*.

If required, the method to be employed to demonstrate compliance with the emission limitation shall be OAC rule 3745-17-03(B)(10).

\* The control efficiency of the baghouse is estimated at 99%.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1 ton/hr shot blast machine, with baghouse	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**THIS IS THE LAST PAGE OF THE PERMIT**

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# Statement of Basis For Title V Permit

## Part I - General

Company Name	Mansfield Plumbing Products LLC - Trim Division
Premise Number	0303000166
What makes this facility a Title V facility?	PE 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		Comments
	SIP (3745- )	Other	
A.1		40 CFR, Part 64	States applicability of CAM rule.

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	Comments
		SIP (3745- )	Other												
P032, P034, P035, P901, P902, P903, P904, P905, P906	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.

P029, P907	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.
P901, P902, P903, P904, P905, P906, P907	Exempt	17-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P901, P902, P903, P904, P905, P906, P907	Exempt	17-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Ashland County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P032, P034, P035, P901, P902, P903, P904, P905, P906	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.
P907	3.40 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and a control efficiency of 99% are sufficient to show compliance.

P029	20.8 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and a control efficiency of 99% are sufficient to show compliance.
P907	0.88 ton fugitive PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the maximum process weight rate, the appropriate emission factor, a capture efficiency of 96% and a control efficiency of 70% are sufficient to show compliance.
P907	Visible fugitive PE shall not exceed 20% opacity as a 3-minute average	N	31-05(A)(3)	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.
P032	0.02 lb PE/hr	N	31-05	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and a control efficiency of 99% are sufficient to show compliance.
P034	0.10 lb PE/hr	N	31-05	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and a control efficiency of 99% are sufficient to show compliance.
P035	0.41 lb PE/hr	N	31-05	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the estimated percentage of pigment emitted (0.005) and a control efficiency of 99% are sufficient to show compliance.
P904	0.76 lb PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and 85% of the emissions are exhausted through the stack are sufficient to show compliance.
P904	3.33 tons 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.
P904	0.04 lb fugitive PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and 15% of the emissions are fugitive are sufficient to show compliance.
P904	0.18 ton fugitive 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.

P904	Visible PE shall not exceed 20% opacity, as a 6-minute average.	N	31-05(A)(3)	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.
P904	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.	N	31-05(A)(3)	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.
P904	0.053 lb Pb/hr (stack)	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restriction on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum lead content of the brass (7%) and the maximum stack hourly PE rate are sufficient to show compliance.
P904	0.23 ton Pb/yr (stack)	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restriction on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum lead content of the brass (7%) and the maximum stack annual PE rate are sufficient to show compliance.
P904	0.003 lb fugitive Pb/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restriction on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum lead content of the brass (7%) and the maximum fugitive hourly PE rate are sufficient to show compliance.

P904	0.013 ton fugitive Pb/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restriction on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum lead content of the brass (7%) and the maximum fugitive annual PE rate are sufficient to show compliance.
P905	5.22 lbs PE/hr (stack)	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum process weight rate, the appropriate emission factor and a capture efficiency of 90% are sufficient to show compliance.
P905	0.18 lb Pb/hr (stack)	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restriction on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month. A CEM is not possible. CAM is not applicable. ET-Calculations based on maximum process weight rate, the appropriate emission factor and a capture efficiency of 90% are sufficient to show compliance.
P905	There shall be no visible emissions from the building enclosure that are associated with this emission unit.	N	31-05(A)(3)	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.
P905	Visible PE shall not exceed 10% opacity, as a 6-minute average	N	31-05(A)(3)	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.

P905	0.94 ton fugitive PE per rolling, 12-month period	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restriction on annual brass throughput. M & R includes monthly records of brass throughput and fugitive PE. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum annual brass throughput, the appropriate emission factor and a fugitive loss rate of 10% and record keeping of annual brass throughput are sufficient to show compliance.
P905	0.03 ton fugitive Pb per rolling 12-month period	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Restrictions on annual brass throughput and on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month and monthly records of brass throughput and fugitive Pb. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum annual brass throughput, the appropriate emission factor and a fugitive loss rate of 10% and record keeping of annual brass throughput are sufficient to show compliance.
P905	8.48 tons PE per rolling, 12-month period (stack)	N	31-05(D)												OR-Restriction on annual brass throughput. M & R includes monthly records of brass throughput and stack PE. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum annual brass throughput, the appropriate emission factor and a capture efficiency of 90% and record keeping of annual brass throughput are sufficient to show compliance.
P905	0.30 ton Pb per rolling, 12-month period (stack)	N	31-05(D)												OR-Restrictions on annual brass throughput and on total lead content of the brass melted in emission unit. M & R includes records of the percent lead, by weight, in the brass ingots used each month and monthly records of brass throughput and stack Pb. A CEM is not possible. CAM is not applicable. ET-Calculations based on the maximum annual brass throughput, the appropriate emission factor and a capture efficiency of 90% and record keeping of annual brass throughput 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.

- **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.

