

Statement of Basis For Title V Permit

Version 2. - 3/27/98

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| Company Name | Mansfield Plumbing Products, Inc. Trim Division | |
| Premise Number | 0303000166 | |
| Number of Non-insignificant Emissions Units | 11 | |
| What makes this facility a Title V facility? | potential particulate emissions and sulfur dioxide emissions in excess of 100 tons/year each | |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)? | yes | |

| Part II (State and Federally Enforceable Requirements) | | | |
|---|-----------------|-------|----------|
| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
| none | | | |

Part III (Requirements Within the State & Federally Enforceable Section)

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|----------------|---|-----------------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| P019 | 3.31 lbs PE/hr | 17-11 (B) | | y | y | y | y | n | n | OR - baghouse pressure drop restriction (2 - 5 inches of water) while the emissions unit is in operation ET - no testing is required. Compliance can be demonstrated based on the maximum process weight and an emission factor of 15.5 pounds PE/ton. |
| P029 | 20.8 lbs PE/hr | 17-11 (B) | | y | y | y | y | n | n | OR - baghouse pressure drop restriction (2 - 5 inches of water) while the emissions unit is in operation ET - no testing is required. Compliance can be demonstrated based on the maximum process weight and an emission factor of 0.2 pound PE/ton. |
| P044 | 4.4 lbs P/hour 0.31 lb lead/hour 6.82 TPY PE 0.01 TPY Pb | | 31-05 | y | y | y | y | n | n | OR - The total lead content of the brass melted in this emissions unit shall not exceed 7 percent (by weight). The number of hours of operation for this emissions unit (when melting leaded brass) shall not exceed 100 hours/rolling, 12-month period. The maximum number of hours of operation for this emissions unit (while melting both leaded and unleaded brass) shall not exceed 3,100 hours/year, based upon a rolling, 12-month period. ET - no testing is required. Compliance can be demonstrated based on the maximum process weight and the appropriate emission factors. |
| P044 | None | 17-11 17- 07(A) | | | | | | | | 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. 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. |
| P019, P029, | 20% opacity... | 17-07 (A) | | y | y | y | y | n | n | OR - baghouse pressure drop restriction (2 - 5 inches of water) while the emissions unit is in operation ET - if required, Method 9 evaluations will be conducted. |

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| P006, P026, P032, P034, P035, P044 Z001 (P901), Z004 (P902) & Z005 (P903) | none | 17-108 17- 07(B) | | | | | | | | <p>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.</p> <p>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.</p> |
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