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

12/20/2013

Certified Mail

Mr. Juan Mejia
Mansfield Plumbing Products
150 East First Street
Perrysville, OH 44864

Facility ID: 0303000002
Permit Number: P0113966
County: Ashland

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 10/8/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

# Response to Comments

| | |
|---|---|
| Facility ID: | 0303000002 |
| Facility Name: | Mansfield Plumbing Products |
| Facility Description: | Vitreous Plumbing Fixtures |
| Facility Address: | 150 East First Street<br>Perrysville, OH 44864<br>Ashland County |
| Permit: | P0113966, Title V Permit - Renewal |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Ashland-Times-Gazette on 10/09/2013. The comment period ended on 11/08/2013. | |
| Hearing date (if held) | |
| Hearing Public Notice Date (if different from draft public notice) | |

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: None**

**Ohio EPA provides the following responses to Mansfield Plumbing Products LLC (MPP) comments on the Draft Title V Permit issued on October 8, 2013, to its Perrysville facility (Permit P0113966).**

Statement of Basis for Air Pollution Title V Permit

The statement of basis incorrectly identifies that the facility is major for Sulfur Dioxide. Potential emissions of Sulfur Dioxide are approximately 2.8 tons/year.

**The Statement of Basis no longer reflects that the facility is major for Sulfur Dioxide.**

**P003 – Glaze Ball Mills**

1.d)(1) & 1.f)(1)b. – This operation does not have an associated stack; particulate emissions are released into the general building enclosure. MPP is requesting that the opacity and daily visible particulate emissions checks language be revised to occur as a fugitive source (building openings, doors, windows, etc.).

**The facility profile for this emissions unit indicates that there is an obstructed vertical stack (EST-37-P3-E) for this emissions unit. If there is no stack associated with this emissions unit, the permit would**

**need to reflect the emissions unit as a fugitive source and the applicable requirements and emissions limitations for the emissions unit would need to change to reflect that.**

**Please inspect this emissions unit to determine if the unit is a stack (point) source, or a fugitive source. Once that determination is made, the permittee will need to contact Ohio EPA again to discuss the appropriate way to permit the emissions unit.**

**P004 – Hand Spray Glaze Spray Booths**

2.c)(3) – 63.11438(b) from the area source rule also applies to this operation.

**Ohio EPA agrees that 63.11438(b) should be included in the permit.**

2.d)(6) - notification requirements from 63.11441(b)(2), (b)(3), and (b)(4) are applicable (although already submitted), similar to 11.d)(6) on page 65 of the permit.

**Ohio EPA agrees that these notification requirements are applicable to this emissions unit, however, since the notifications have already been submitted, these requirements will be removed from the terms and conditions for this emissions unit.**

**P046 – Tank Spray Machine**

6.c)(3) – 63.11438(b) from the area source rule also applies to this operation.

**Ohio EPA agrees that 63.11438(b) should be included in the permit.**

6.d)(9) - notification requirements from 63.11441(b)(2), (b)(3), and (b)(4) are applicable (although already submitted), similar to 11.d)(6) on page 65 of the permit.

**Ohio EPA agrees that these notification requirements are applicable to this emissions unit, however, since the notifications have already been submitted, these requirements will be removed from the terms and conditions for this emissions unit.**

6.e)(2) – notification requirements from 63.11441(a) are applicable (although already submitted), similar to 2.e)(2) on page 25 of the permit.

**Ohio EPA agrees that this notification requirements is applicable to this emissions unit, however, since the notification has already been submitted, this requirement will be removed from the terms and conditions for this emissions unit.**

**P047 – Kiln #4**

7.d)(2) – notification requirements from 63.11441(b)(1) are applicable (although already submitted), similar to 3.d)(2) on page 28 of the permit.

**I believe the reference here was intended to be 7.e.(2) and d)(2) does not reference 63.1141(b)(1). Although this is an applicable requirement, the requirement will be removed from the permit since the notification has already been submitted.**

7.f)(1)e. – MPP is requesting the Applicable Compliance Method language be changed to “If required, compliance with the stack visible…”, similar to opacity requirements for other emissions units.

**The Applicable Compliance Method language will be changed to the "If required" language similar to emissions unit P033.**

**P048 – Bickley Shuttle Kiln**

8.b)(1)a., 8.f)(1)a., & 8.f)(1)b. – P048 consists of a single Bickley Shuttle Kiln following the removal of the the second Bickley Shuttle Kiln in 2013. The NOx and CO emissions in the draft Title V Permit should be updated to reflect the potential to emit for the remaining kiln of 0.26 lbsNOx/hr, 1.16 tons NOx/yr, 1.98 lbs CO/hr, and 8.67 tons CO/yr.

**Emissions limitations established based on OAC rule 3745-31-05(A)(3) cannot be changed in the Title V permit unless they have been changed in the associated PTI/PTIO for an emissions unit. In this case, PTI 03-17397, issued 1/29/08 would need to be administratively modified to reflect the removal of the second Bickley Shuttle Kiln, resulting in a decrease in emissions and associated potential to emit for the associated pollutants.**

**If the permittee wishes to reflect the change in emissions, they will need to submit and administrative modification permit application for emissions unit P048 requesting not only the removal of the second Bickley Shuttle Kiln, but a change in applicable emissions limitations based on the removal of the kiln.**

**In addition, according to the comment, the potential to emit for NOx would be updated to 0.26 lbNOx/hr and 1.16 tons NOx/yr and the CO emissions would be updated to 1.98 lbs CO/hr and 8.67 tons CO/yr. The NOx emissions have decreased as expected by the removal of a kiln. However, the CO emissions have increased with the removal of the kiln. Please explain the increase in CO emissions associated with the removal of the kiln. If CO emissions have increased, a PTI modification would be necessary for the emissions unit. Please advise Ohio EPA on how the permittee wishes to proceed with the permitting of this emissions unit.**

**P049 – Kiln #3**

9.d)(2) – notification requirements from 63.11441(b)(1) are applicable, similar to 3.d)(2) on page 28 of the permit.

**If the notification of compliance status has been submitted for emissions unit P033, then 63.11441(b)(1)will be removed from the permit. Currently 63.1141(b)(1) is listed in two places of the Title V permit [3.d)(2) and 3.e)(2). Please indicate whether this requirement has been met for emissions unit P033. If the requirement has not yet been met for emissions unit P033, it will remain in 3.e)(2) of the permit and be removed from section 3.d)(2) of the permit. If the requirement has been met, it will be removed from both sections of the permit as it has already been met.**

**In addition, since it has not been indicated that the required notification has been submitted for P049, this requirement will remain in the permit at this time in section 9.e)(2). If the notification has been submitted, please indicate such and the requirement will be removed from the permit.**

9.f)(1)e. – MPP is requesting the Applicable Compliance Method language be changed to "If required, compliance with the stack visible…", similar to opacity requirements for other emissions units.

**The Applicable Compliance Method language will be changed to the "If required" language similar to emissions unit P033.**

**P055 – Lav Machine**

10.c)(3) – 63.11438(d) from the area source rule may also apply to this operation.

**Ohio EPA agrees that this is an applicable requirement and as such, will be included in the permit for this emissions unit.**

10.d)(6) - notification requirements from 63.11441(b)(2), (b)(3), and (b)(4) are applicable (although already submitted when this unit was part of P004), similar to 11.d)(6) on page 65 of the permit.

**Ohio EPA agrees that these notification requirements are applicable to this emissions unit, however, since the notifications have already been submitted, these requirements will be removed from the terms and conditions for this emissions unit.**

10.e)(2) – notification requirements from 63.11441(a) are applicable (although already submitted when this unit was part of P004), similar to 2.e)(2) on page 25 of the permit.

**Ohio EPA agrees that this notification requirements is applicable to this emissions unit, however, since the notification has already been submitted, this requirement will be removed from the terms and conditions for this emissions unit.**

**P042/P045 – Glaze Spray Booth No. 1/No. 2**

11.e)(2) – notification requirements from 63.11441(a) are applicable (although already submitted), similar to 2.e)(2) on page 25 of the permit.

**Ohio EPA agrees that this notification requirements is applicable to this emissions unit, however, since the notification has already been submitted, this requirement will be removed from the terms and conditions for this emissions unit.**

11.f)(1)a. – MPP is requesting that this term be removed as there is no opacity requirement applicable to these operations.

**Based on a review of all applicable rules/requirements, Ohio EPA agrees, there is no longer an opacity requirement associated with this emissions unit, therefore, term 11.f)(1)a. will be removed from the permit at this time.**

11.f)(1)b.i. – For clarification, MPP is requesting that the maximum hourly glaze throughput be changed to "…(87 gallons/hour, combined)…".
**For clarification purposes, 87 gallons/hr combined will be added to term 11.f)(1)b.i.**

**P050/P051 – Glaze Spray Booth No. 3/No. 4**

12.b)(1)b. – The PTI was issued on 12/17/12.

**Ohio EPA agrees that the date should be changed from 12/17/02 to 12/17/12.**

12.c)(4) – 63.11438(d) from the area source rule may also apply to this operation.

**Ohio EPA agrees 63.11438d) applies to this operation and therefore, will be incorporated into the permit.**

12.d)(10) - notification requirements from 63.11441(b)(2), (b)(3), and (b)(4) are applicable, similar to 11.d)(6) on page 65 of the permit.

**Ohio EPA agrees that requirements 63.11441(b)(2), (b)(3), and (b)(4) are applicable to this emissions unit. Section 12.e)(2) of the permit already includes (b)(2) and (b)(3), but (b)(4) will also be included.**

**It should be noted that these are reporting requirements and should not have been included in the monitoring/recordkeeping section of the permit similar to 11.d)(6) on page 65 of the permit. I will review each emissions unit and as necessary (i.e. if these reports have not already been submitted), place these requirements in the appropriate reporting section of the permit and remove them from the monitoring/recordkeeping as necessary.**

12.e)(2) – notification requirements from 63.11441(a) are applicable, similar to 2.e)(2) on page 25 of the permit.

**Since it has not yet been 120 days after the applicable compliance date associated with 40 CFR, Part 63, Subpart RRRR, 63.11441(a) will be included in section 12.e)(2) of the permit.**

**Additional Comments:**

**There appears to be inconsistency on my part in where and when sections 63.11441(a), (b), (c), and (d) have been incorporated into this permit. I will review the entire permit to make sure that if the reports associated with these requirements have been submitted, the requirements have been removed. In addition, if the reports have not yet been submitted, I will make sure that I have incorporated these requirements into the reporting section [section e)] instead of the monitoring/recordkeeping [section d] for each emissions unit as necessary.**

**Thank you for your comments. Should any questions about my responses, please feel free to contact me by e-mail at julie.budge@epa.state.oh.us or by phone at (419) 373-3132.**

# PRELIMINARY PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
Mansfield Plumbing Products

| | |
|---|---|
| Facility ID: | 0303000002 |
| Permit Number: | P0113966 |
| Permit Type: | Renewal |
| Issued: | 12/20/2013 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

**Division of Air Pollution Control**
**Title V Permit**
for
Mansfield Plumbing Products

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# Authorization

| | |
|---|---|
| Facility ID: | 0303000002 |
| Facility Description: | Vitreous Plumbing Fixtures |
| Application Number(s): | A0046357, A0048041, A0048219 |
| Permit Number: | P0113966 |
| Permit Description: | Renewal Title V operating permit for a vitreous plumbing fixtures manufacturing facility including, but not limited to kilns and glaze spray operations. |
| Permit Type: | Renewal |
| Issue Date: | 12/20/2013 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0086752 |

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Mansfield Plumbing Products
150 East First Street
Perrysville, OH 44864

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## *2.* 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 C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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 recordingsfor 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:

(1) 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 by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) 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) 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 submittedscheduled maintenancerequests, 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))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions 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 submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted 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 Standard 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 Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

(3) 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 Standard Term and Condition A.2)c)(2) 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; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office 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 section B. Facility-Wide Terms and Conditions 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 Standard Term and Condition A.2.c)(2) 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))*

(4) 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." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

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

**3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From 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 Standard Term and Condition A.2.c)(1) above.

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

**4. 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))*

**5. 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))*

**6. 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))*

**7. General Requirements**

a) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 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 when:

(1) 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

(2) 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

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. 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))*

**8. 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))*

**9. 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))*

**10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

**11. 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))*

**12. 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))*

**13. 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

Officialthat, 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:

(1) 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.

(2) 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.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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 Ohio EPA DAPC, Northwest District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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 Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) 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))*

**14. 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))*

**15. 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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))*

**16. 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))*

**17. 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))*

**18. 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

**20. 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))*

**21. 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))*

**22. 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.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified 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)*

**23. 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 operating 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)))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

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 theOhio EPA DAPC, Northwest District Office.

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 Ohio EPA DAPC, Northwest District Office. 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 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.)

**25. Records Retention RequirementsUnder State Law Only**

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.

**26. 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.

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

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

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 Ohio EPA DAPC, Northwest District Office 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).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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 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 Standard Term and Condition A.2.c)(2); 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 potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

## 30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions units P041, P042, P045, P046, P050 and P051 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]

3. The following emissions units located at this facility are subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

   a) P052 520 horsepower emergency generator #1 (PBR11012);
   b) P053 190 horsepower diesel fired emergency air compressor (PBR11012); and
   c) P054 520 horsepower emergency generator #2 (PBR 11012)

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

4. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

   a) P052 520 horsepower emergency generator #1 (PBR 11012);
   b) P053 190 horsepower diesel fired emergency air compressor (PBR 11012);
   c) P054 520 horsepower emergency generator #2 (PBR 11012);
   d) B009 9.75 mmBtu/hr natural gas fired make-up air #1;
   e) B010 9.75 mmBtu/hr natural gas fired make-up air #2;
   f) B011 9.75 mmBtu/hr natural gas fired make-up air #3;
   g) B012 9.75 mmBtu/hr natural gas fired make-up air air #4;
   h) B013 9.75 mmBtu/hr natural gas fired make-up air air #5;
   i) B014 9.75 mmBtu/hr natural gas fired make-up air air #6; and
   j) B015 9.75 mmBtu/hr natural gas fired make-up air air #7.

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

5. Existing emergency compression ignition (CI) reciprocating internal combustion engines (RICE), located at an area source for Hazardous Air Pollutants (HAPs), are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, **EU#'s P052**, **P053, &P054** installed before 6/12/06, shall meet the requirements of 63, Subpart ZZZZ no later than 5/3/13.

   The RICE must meet the definition of an emergency stationary RICE in section 63.6675, which includes operating according to the provisions specified in section 63.6640(f), and the permittee shall meet the following requirements contained in 40 CFR Part 63, Subpart ZZZZ:

| | |
|---|---|
| 66.6605(a) & (b) | General Compliance |
| 63.6603(a), 63.6625(e), (f), (h), and (i) | Monitoring, Installation, Collection, Operation, & Maintenance |
| 66.6640 (a), (b), (e), & (f) | Continuous Compliance |
| 63.6655(d), (e) &(f) & 63.6660(a), (b), and (c) | Recordkeeping |
| 66.6665 | Table 8 General Provisions |

[Authority for term: 40 CFR Part 63 Subpart ZZZZ]

# C. Emissions Unit Terms and Conditions

**1. P003, Glaze Ball Mills**

**Operations, Property and/or Equipment Description:**

Glaze Ball Mills

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-11(B) | 2.00 lbs particulate emissions (PE)/hr |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. 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)]

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
2.00 lbs PE/hr

<u>Applicable Compliance Method:</u>
If required, the permittee shall demonstrate compliance with the allowable hourly PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(10)]

b. <u>Emission Limitation:</u>
Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with the visible PE limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

g) Miscellaneous Requirements

(1) None.

**2. P004, Hand Spray Glaze Spray Booths**

**Operations, Property and/or Equipment Description:**

Hand Spray Glaze Spray Booths (2)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-11(C) | See b)(2)a. |
| b. | 40 CFR Part 63, Subpart RRRRRR | See c)(3), d)(6) and e)(2) |
| c. | 40 CFR 63.1-16<br>(40 CFR 63.11443) | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-16 apply. |

(2) Additional Terms and Conditions

a. The permittee shall operate the wet scrubber whenever the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall install and operate the wet scrubber system for control of particulate emissions whenever the emissions unit is in operation and shall maintain the wet scrubber system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(2) In the event the wet scrubber system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438 (c), (d), and (e) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart RRRRRR]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the wet scrubber control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(2) The permittee shall conduct periodic inspections of the wet scrubber control system to determine whether they are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the wet scrubber control system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(4) The permittee shall document each inspection (periodic and annual) of the wet scrubber control system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(5) The permittee shall maintain records that document any time periods when the wet scrubber control system was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the wet scrubber control system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(b), (c) and (d) | monitoring requirements for new and existing sources |
| 63.11438(b) and 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart RRRRRR]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any daily record showing that the wet scrubber control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

**3. P033, Kiln #2**

**Operations, Property and/or Equipment Description:**

natural gas fired kiln no.2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-17350, issued 10/30/07) | 1.65 lbs carbon monoxide (CO)/hr and 7.23 tons CO/year<br><br>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average<br><br>See b)(2)a. |
| b. | OAC rule 3745-17-07(A) | See b)(2)b. |
| c. | OAC rule 3745-17-11(B) | See b)(2)c. |
| d. | OAC rule 3745-18-06 | See b)(2)d. |
| e. | 40 CFR Part 63, Subpart RRRRRR | See c)(2) d)(2), and e)(2) |
| f. | 40 CFR 63.1-16<br>(40 CFR 63.11443) | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-16 apply. |

(2) Additional Terms and Conditions

a. Best available technology (BAT) requirements for this emissions unit has been determined to be the firing of only natural gas and compliance with the terms and conditions of this permit.

Emissions from particulate matter less than 10 microns in size (PM10), nitrogen oxides (NOx) and sulfur dioxide (SO2) have been determined to be negligible, therefore, no limits are being established for these pollutants under OAC rule 3745-31-05(A)(3) at this time.

b. This emissions unit is exempt from the visible emission 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.

c. 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)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Ashland county.

d. The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.09 ton per year and was based on the maximum hourly process capacity of 0.50 tons, an emission factor from AP-42, Table 11.7-1 (7/96) of 0.045 lbs SO2/ton, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17350]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438(a) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart RRRRRR]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(a) and (d) | monitoring requirements for new and existing sources |
| 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart RRRRRR]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

f) Testing Requirements

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

a. Emission Limitation: 1.65 lbs CO/hr and 7.23 tons CO/year

Applicable Compliance Method: The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 10, as applicable, of 40 CFR, Part 60, Appendix A.

*The hourly potential to emit is based on the maximum hourly process capacity of 0.50 tons and an AP-42, Table 11.7-1 (7/98) emission factor of 3.3 lbs CO/ton.

The annual limitation was developed by multiplying the potential lb/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

b. Emission Limitation: Visible particulate stack emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee's 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 cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.

## 4. P041, Plaster Delivery System

**Operations, Property and/or Equipment Description:**

Plaster Delivery System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule. |
| b. | OAC rule 3745-17-11(B) | See b)(2)a. |
| c. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-6539, issued 6/17/92) | 0.17 lb PE/hr and 0.74 tons PE/yr<br><br>See b)(2)b. |
| d. | 40 CFR, Part 64 - Compliance Assurance Monitoring (CAM) | See d) (1) through d)(5) and e)(1). |

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

c. The 0.17 lb PE/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;

b. the identification of the stack observed;

c. the color of the emissions;

d. the total duration of any visible emission observation; and

e. the corrective actions, if any, taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the dust collector(s) controlling this emissions unit is daily visible emission checks. When the performance indicator shows operation outside its normal or usual manner of operation, 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 e)(1) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(3) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(4) In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an inspection and maintenance program for the baghouse, including but not limited to:

a. checking the bags / filters for deterioration or degradation;

b. checking the cleaning system for proper operation; and

c. 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 are considered inadequate, the permittee shall develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(5) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system in accordance with any manufacturer recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. the root cause and any corrective actions taken to minimize or eliminate the visible particulate.

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

f) Testing Requirements

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

a. <u>Emission Limitation:</u> Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

<u>Applicable Compliance Method:</u> If required, the method to be employed to demonstrate compliance with the VE limitation shall be OAC rule 3745-17-03(B)(1).

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

b. <u>Emission Limitations:</u> 0.17 lb PE/hour and 0.74 tons PE/yr

<u>Applicable Compliance Method:</u> The hourly emission limitation was developed by multiplying the maximum amount of plaster unloaded (7,150 pounds/hour) by an

estimated emission factor of 1 pound PE/100 pounds of plaster unloaded*, and then multiplying this value by a control factor of (1-0.998)**.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing conducted in accordance with Methods 1 - 5, of 40 CFR, Part 60, Appendix A.

*This emission factor was derived by the permittee from material balance calculations.

**The estimated control efficiency of the baghouse is 99.8%.

The annual emission limitation was developed by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-6539]

g) Miscellaneous Requirements

(1) None.

**5. P043, Kiln #10**

**Operations, Property and/or Equipment Description:**

natural gas fired kiln no.10

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | See b)(2)a. |
| b. | OAC rule 3745-17-11(B) | See b)(2)b. |
| c. | OAC rule 3745-18-06 | See b)(2)c. |
| d. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-17350, issued 10/30/07) | 2.70 lbs particulate matter less than 10 microns in size(PM10)/hr and 11.83 tons PE/year [See b)(2)d]<br><br>2.42 lbs nitrogen oxides (NOx)/hr and 10.60 tons NOx/year<br><br>18.2 lbs carbon monoxide (CO)/hr and 79.72 tons CO/year<br><br>2.37 lbs organic compounds (OC)/hr and 10.38 tons OC/year<br><br>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.<br><br>See b)(2)e. |
| e. | 40 CFR, Part 63, Subpart RRRRRR | See c)(2), d)(2), and e)(2) |
| f. | 40 CFR 63.1-16<br>(40 CFR 63.11443 | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-16 apply. |

(2) Additional Terms and Conditions

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.

b. The uncontrolled mass rate of particulate emissions 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.

c. The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 1.10 tons per year and was based on the maximum hourly process capacity of 5.50 tons, an emission factor from AP-42, Table 11.7-1 (7/96) of 0.045 lbs SO2/ton, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs.

d. All PE are assumed to be particulate matter less than 10 microns in size.

e. Best available technology (BAT) requirements for this emissions unit has been determined to be the firing of only natural gas and compliance with the terms and conditions of this permit.

Emissions from sulfur dioxide (SO2) have been determined to be negligible, therefore, no limits are being established under OAC rule 3745-31-05(A)(3) at this time.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17350]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438(a) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart RRRRRR]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(a) and (d) | monitoring requirements for new and existing sources |
| 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart RRRRRR]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations: 2.70 lbs PM10/hr and 11.83 tons PM10/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 5.50 tons and an AP-42, Table 11.7-1 (7/98) emission factor of 0.49 lb PE/ton. If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Method 201 or 201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

b. Emission Limitations: 2.42 lbsNOx/hr and 10.60 tons NOx/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 5.50 tons and a vendor supplied emission factor of 0.44 lbNOx/ton. If required, the permittee shall demonstrate compliance with the hourly emission limitation by emissions testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

c. Emission Limitations: 18.2 lbs CO/hr and 79.72 tons CO/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 5.50 tons and an AP-42, Table 11.7-1 (7/98) emission factor of 3.3 lb CO/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

d. Emission Limitations: 2.37 lbs OC/hr and 10.38 tons OC/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 5.50 tons and an AP-42, Table 11.7-1 (7/98) emission factor of 0.43 lb OC/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1 through 4 and Method 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

e. Emission Limitation: Visible particulate stack emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17350]

g) Miscellaneous Requirements

(1) None.

## 6. P046, Tank Spray Machine

**Operations, Property and/or Equipment Description:**

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-11(C) | See b)(2)a. |
| b. | 40 CFR Part 63, Subpart RRRRRR | See c)(3), d)(10) and e)(3) |
| c. | 40 CFR 63.1-16<br>(40 CFR 63.11443 | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-16 apply. |
| d. | 40 CFR, Part 64 - Compliance Assurance Monitoring (CAM) | See d)(6) through d)(8) and e)(1) |

(2) Additional Terms and Conditions

a. The permittee shall operate the baffles and water curtain system whenever the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall install and operate the baffles and water curtain system for control of particulate emissions whenever the emissions unit is in operation and shall maintain the baffles and water curtain system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(2) In the event the baffles and water curtain system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438 c), (d), and (e) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart RRRRRR]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baffles and water curtain system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(2) The permittee shall conduct periodic inspections of the baffles and water curtain system to determine whether they are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the baffles and water curtain control system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(4) The permittee shall document each inspection (periodic and annual) of the baffles and water curtain control system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(5) The permittee shall maintain daily records that document any time periods when the baffles and water curtain control system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the baffles and water curtain control system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and 40 CFR Part 64]

(6) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baffles and water curtain system controlling this emissions unit is to ensure the control system is in service and operating in accordance with the manufacturer's recommendations when the emissions unit is in operation. When the performance indicators show 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 e) 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 baffles and water curtain system shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

(7) 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, Part 64]

(8) 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, Part 64]

(9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(b), (c) and (d) | monitoring requirements for new and existing sources |
| 63.11438(b) and 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart RRRRRR]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any daily record showing that the baffles and water curtain control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C) and 40 CFR, Part 64]

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

**7. P047, Kiln #4**

**Operations, Property and/or Equipment Description:**

Natural gas fired kiln.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | See b)(2)a. |
| b. | OAC rule 3745-17-11(B) | See b)(2)b. |
| c. | OAC rule 3745-31-05(A)(3), as effective 11/30/01<br>[PTI #P0115202, issued 8/8/13] | 0.93 lbparticulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns ($PM_{10}$)/hour and 4.07 tons $PM_{10}$/year<br><br>1.54 lbs volatile organic compounds (VOC)/hour and 6.75 tons VOC/year<br><br>1.57 lbs nitrogen oxides (NOx)/hour and 6.88 tons NOx/year<br><br>11.81 lbs carbon monoxide (CO/hr) and 51.73 tons CO/yr<br><br>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.<br><br>See b)(2)c. and b)(2)d. |
| d. | OAC rule 3745-31-05(A)(3), as effective 12/01/06 | See b)(2)e. |
| e. | OAC rule 3745-18-06 | See b)(2)f. |
| f. | 40 CFR, Part 63, Subpart RRRRRR | See c)(2), d)(2) and e)(2) |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| g. | 40 CFR 63.1-16<br>(40 CFR 63.11443) | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-16 apply. |

(2) Additional Terms and Conditions

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.

b. The uncontrolled mass rate of particulate emissions 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.

c. Emissions from sulfur dioxide (SO2) have been determined to be negligible, therefore, no limits are being established under OAC rule 3745-31-05(A)(3), as effective 11/30/01, at this time.

d. The permittee satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

Additionally, once the U.S. EPA approves the December 1, 2006 version of 3745-31-05, BAT requirements will not be applicable to the particulate emissions emitted from this emissions unit. BAT (under Senate Bill 265 changes) is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

e. OAC rule 3745-31-05(A)(3)(a)(ii) applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under 3745-31-05(A)(3)(a) do not apply to emissions of $PM_{10}$, VOC, $SO_2$ and NOx because the potential to emit (PTE) for $PM_{10}$, VOC, $SO_2$ and NOx is less than 10 tons per year.

f. The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.71 ton per year and was based on the maximum hourly process capacity of 3.58 tons, a manufacturer's specified emission factor of 0.045 lb SO2/ton, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0115202]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438(a) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 63, Subpart RRRRRR, and PTI #P0115202]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(a) and (d) | monitoring requirements for new and existing sources |
| 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart RRRRRR, and PTI #P0115202]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

f) Testing Requirements

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

a. Emission Limitations: 0.93 lb $PM_{10}$/hour and 4.07 tons $PM_{10}$/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 3.58 tons by an AP-42, Table 11.7-1 (7/98) emission factor of 0.49 lb PE/ton. The resulting PE limitation as then entered into the USEPA's PM Calculator Software to calculate the $PM_{10}$ emissions. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in Methods 1-4 of 40 CFR, Part 60 Appendix A and Methods 201, 201A, and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

b. Emission Limitations: 1.54 lbs VOC/hour and 6.75 tons VOC/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 3.58 tons by an AP-42, Table 11.7-1 (7/98) emission factor of 0.43 lb VOC/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

c. Emission Limitations: 1.57 lbsNOx/hour and 6.88 tons NOx/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 3.58 tons by a manufacturer supplied emission factor for a similar source of 0.44 lbNOx/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions

testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

d. Emission Limitations: 11.81 lbs CO/hr and 51.73 tons CO/yr

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 3.58 tons by a manufacturer supplied emission factor for a similar source of 3.3 lbs CO/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

e. Emission Limitations: Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115202]

g) Miscellaneous Requirements

(1) None.

**8. P048, Bickley Shuttle Kiln**

**Operations, Property and/or Equipment Description:**

Bickley Shuttle Kiln

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-17397, issued 1/29/08) | 1.87 lbs nitrogen oxides (NOx)/hr and 8.20 tons NOx/year<br><br>1.57 lbs carbon monoxide (CO)/hr and 6.88 tons CO/year<br><br>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.<br>See b)(2)a. |
| b. | OAC rule 3745-17-07(A) | See b)(2)b. |
| c. | OAC rule 3745-17-11(B) | See b)(2)c. |
| d. | OAC rule 3745-18-06 | See b)(2)d. |

(2) Additional Terms and Conditions

a. "Best Available Technology" (BAT) requirements for this emissions unit has been determined to be the firing of only natural gas and compliance with the terms and conditions of this permit.

Emissions from particulate matter less than 10 microns in size (PM10), sulfur dioxide (SO2) have been determined to be negligible, therefore, no limits are being established for these pollutants under OAC rule 3745-31-03(A)(3) at this time.

b. This emissions unit is exempt from the visible emission 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.

c. 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)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Ashland county.

d. The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.05 tons per year and was based on the maximum hourly fuel usage rate of 0.0187 (MMCF), an emission factor from AP-42, Table 1.4-3 & 4 (7/98) of 0.6 lb/$10^6$scf, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17397]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17397]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17397]

f) Testing Requirements

(1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u> 1.87 lbsNOx/hr and 8.20 tons NOx/yr

<u>Applicable Compliance Method:</u> The hourly emission limitation was developed by multiplying the maximum hourly fuel usage rate of 0.0187 (MMCF) and an AP-42, Table 1.4-3 & 4 (7/98) emission factor of 0.6 lb/$10^6$scf. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17397]

b. Emission Limitations: 1.57 lbs CO/hr and 6.88 tons CO/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly fuel usage rate of 0.0187 (MMCF) and an AP-42, Table 1.4-3 & 4 (7/98) emission factor of 84 lb/$10^6$scf. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17397]

c. Emission Limitation:
Visible particulate stack emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with the test methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17397]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because 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 cause the emissions of any pollutant that has a listed TLV to increase above.

**9. P049, Kiln #3**

**Operations, Property and/or Equipment Description:**

Kiln #3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | See b)(2)a. |
| b. | OAC rule 3745-17-11(B) | See b)(2)b. |
| c. | OAC rule 3745-31-05(A)(3), as effective 11/30/01<br>[PTI #P0112051, issued 12/17/12] | 1.06 lbsparticulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns ($PM_{10}$)/hour and 4.64 tons $PM_{10}$/year<br><br>1.75 lbs volatile organic compounds (VOC)/hour and 7.67 tons VOC/year<br><br>1.80 lbs nitrogen oxides (NOx)/hour and 7.88 tons NOx/year<br><br>Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.<br><br>See b)(2)c. and b)(2)d. |
| d. | OAC rule 3745-31-05(A)(3), as effective 12/01/06 | See b)(2)e. |
| e. | ORC 3704.03(T) | Emissions of carbon monoxide (CO) shall not exceed 3.3 lbs per ton of ceramic product produced |
| f. | OAC rule 3745-18-06 | See b)(2)f. |
| g. | 40 CFR, Part 63, Subpart RRRRRR | See c)(2), d)(2) and e)(3). |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| h. | 40 CFR 63.1-15<br>(40 CFR 63.11443) | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-15 apply. |

(2) Additional Terms and Conditions

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.

b. The uncontrolled mass rate of particulate emissions 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.

c. Emissions from sulfur dioxide (SO2) have been determined to be negligible, therefore, no limits are being established under OAC rule 3745-31-05(A)(3), as effective 11/30/01, at this time.

d. The permittee satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

   Additionally, once the U.S. EPA approves the December 1, 2006 version of 3745-31-05, BAT requirements will not be applicable to the particulate emissions emitted from this emissions unit. BAT (under Senate Bill 265 changes) is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

e. OAC rule 3745-31-05(A)(3)(a)(ii) applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under 3745-31-05(A)(3)(a) do not apply to emissions of $PM_{10}$, VOC, $SO_2$ and NOx because the potential to emit (PTE) for $PM_{10}$, VOC, $SO_2$ and NOx is less than 10 tons per year.

f. The emission limitation specified by this rule is less stringent than the uncontrolled potential to emit (PTE) for SO2 for this emissions unit. The PTE for SO2 from this emissions unit is 0.79 tons per year and was based on the maximum hourly process capacity of 4.08 tons, a manufacturer's specified emission factor of 0.045 lbs SO2/ton, a maximum operating schedule of 8760 hours per year and a conversion factor of 1 ton per 2000 lbs.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-01(A)(1) and PTI #P0112051]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438(a) | standards for new and existing sources |

[OAC rule 3745-77-01(A)(1), 40 CFR, Part 63, Subpart RRRRRR, and PTI #P0112051]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(a) and (d) | monitoring requirements for new and existing sources |
| 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-01(C)(1), 40 CFR, Part 63, Subpart RRRRRR, and PTI #P0112051]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

f) Testing Requirements

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

a. Emission Limitations: 1.06 lbs $PM_{10}$/hour and 4.64 tons $PM_{10}$/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 4.08 tons by an AP-42, Table 11.7-1 (7/98) emission factor of 0.49 lb PE/ton. The resulting PE limitation as then entered into the USEPA's PM Calculator Software to calculate the $PM_{10}$ emissions. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the test methods and procedures in Method 201 or 201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

b. Emission Limitations: 1.75 lbs VOC/hour and 7.67 tons VOC/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 4.08 tons by an AP-42, Table 11.7-1 (7/98) emission factor of 0.43 lb VOC/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1 through 4 and Method 18, 25 or 25A of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

c. Emission Limitations: 1.80 lbsNOx/hour and 7.88 tons NOx/year

Applicable Compliance Method: The hourly emission limitation was developed by multiplying the maximum hourly process capacity of 4.08 tons by a manufacturer supplied emission factor for a similar source of 0.44 lbNOx/ton. If required, the permittee shall demonstrate compliance with the hourly limitation by

emissions testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

d. Emission Limitation: Emissions of CO shall not exceed 3.3 lbs per ton of ceramic product produced.

Applicable Compliance Method: The applicable emission limitation was established from AP-42, Table 11.7-1 (7/98). If required, the permittee shall demonstrate compliance with the lb/ton limitation by emissions testing conducted in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

e. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a six-minute average.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-01(C)(1) and PTI #P0112051]

g) Miscellaneous Requirements

(1) None.

**10. P055, Lav Machine**

**Operations, Property and/or Equipment Description:**

Lav Machine

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-11(C) | See b)(2)a. |
| b. | 40 CFR Part 63, Subpart RRRRRR | See c)(3), d)(6) and e)(2). |
| c. | 40 CFR 63.1-16<br>(40 CFR 63.11443 | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-16 apply. |

(2) Additional Terms and Conditions

a. The permittee shall operate the baffles and water curtain system whenever the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall install and operate the baffles and water curtain system for control of particulate emissions whenever the emissions unit is in operation and shall maintain the baffles and water curtain system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(2) In the event the baffles and water curtain system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(3) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438 (c), (d), and (e) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart RRRRRR]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baffles and water curtain system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(2) The permittee shall conduct periodic inspections of the baffles and water curtain system to determine whether they are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the baffles and water curtain control system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(4) The permittee shall document each inspection (periodic and annual) of the baffles and water curtain control system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(5) The permittee shall maintain records that document any time periods when the baffles and water curtain control system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the baffles and water curtain control system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(b), (c) and (d) | monitoring requirements for new and existing sources |
| 63.11438(b) and 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart RRRRRR]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any daily record showing that the baffles and water curtain control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

## 11. Emissions Unit Group -Glaze Spray Booths: P042,P045,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P042 | Glaze spray booth no. 1 with baffles and water curtain |
| P045 | Glaze spray booth no. 2 with baffles and water curtain |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05<br>(PTI #03-8221, modified 12/29/06) | 1.32 lbs particulate emissions (PE)/hr and 5.8 tons PE/yr (for emissions units P042 and P045 combined)<br><br>BAT also includes compliance with the requirements based on OAC rule 3745-17-07(A). |
| b. | OAC rule 3745-17-11(C) | See b)(2)b. |
| c. | 40 CFR, Part 63, Subpart RRRRRR | See c)(2), d)(7) and e)(2). |
| d. | 40 CFR, Part 64 - Compliance Assurance Monitoring (CAM) | See d)(1) through d)(6) and e)(1). |

(2) Additional Terms and Conditions

a. "Best Available Technology" (BAT) requirements for these emissions units has been determined to be the use of baffles, water curtain and compliance with the terms and conditions of this permit.

b. This emissions unit is exempt from the requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(C)(3).

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438(b), (c), (d) and (e) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart RRRRRR]

d) Monitoring and/or Recordkeeping 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 baffles and water curtain 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 baffles and water curtain 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 baffles and water curtain is 1 to 6 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]

(2) In addition to the parametric monitoring required in d)(2) of this permit, the permittee shall conduct monthly visual inspections of the water curtain system to ensure the equipment is operating properly and not deteriorating.

Records of these inspections shall be kept in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(3) The CAM plan for these emissions units has been developed for particulate emissions. The CAM performance indicators for the water curtain system controlling this emissions unit are the static pressure drop across the water curtain, which was established in accordance with the manufacturer's recommendations. When the static pressure drop show 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 e) 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 water curtain system shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

(4) 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, Part 64]

(5) 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, Part 64]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(b), (c) and (d) | monitoring requirements for new and existing sources |
| 63.1138(b) and 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart RRRRRR]

e) 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 water curtain 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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u> 1.32 lbs PE/hour and 5.8 tons PE/yr (for emissions units P042 and P045 combined)

<u>Applicable Compliance Method:</u> The permittee may demonstrate compliance with this emission limitation as follows:

i. multiply the maximum quantity of glaze employed (87 gallons/hour combined) by the density of the glaze (14.0 pounds/gallon);

ii. multiply the value from i by the maximum solids content, by weight, of the glaze (0.65);

iii. multiply the value from ii by the transfer efficiency of this operation (1-0.86); and

iv. multiply the value from iii by a control factor of (1-.99)*.

*The estimated control efficiency of the water curtain is 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 annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is shown, compliance with the annual limitation shall be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-8221]

g) Miscellaneous Requirements

(1) None.

## 12. Emissions Unit Group -Glaze Spray Booths: P050,P051,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P050 | Glaze spray booth no. 3 with baffles and water curtain |
| P051 | Glaze spray booth no. 4 with baffles and water curtain |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-11(C) | See b)(2)a. |
| b. | OAC rule 3745-31-05(F)<br>(PTI P0112051 issued 12/17/12) | 1.04 lbsparticulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns ($PM_{10}$)/hour and 4.56 tons $PM_{10}$/year<br><br>See b)(2)a. and b)(2)b. |
| c. | OAC rule 3745-31-05(A)(3), as effective 11/30/01<br>(PTI P0112051 issued 12/17/12) | See b)(2)c. and b)(2)d. |
| d. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06<br>(PTI P0112051 issued 12/17/02) | See b)(2)e. |
| e. | 40 CFR, Part 63, Subpart RRRRRR | See c)(4) and d)(9) |
| f. | 40 CFR 63.1-15<br>(40 CFR 63.11443 | Table 1 to Subpart RRRRRR of 40 CFR Part 63 – Applicability of General Provisions to Subpart RRRRRR shows which parts of the General Provisions in 40 CFR 63.1-15 apply. |
| g. | 40 CFR, Part 64 - Compliance Assurance Monitoring (CAM) | See d)(4) through d)(8) and e)(3) |

(2) Additional Terms and Conditions

a. The permittee shall operate the baffles and water curtain whenever this emissions unit is in operation.

b. Permit #P0112051, issued on December 17, 2012, established the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are based on the operational restrictions contained in c)(1):

   i. $PM_{10}$ emissions shall not exceed 1.04 lbs/hour and 4.56 tons/year

c. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F).

   It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06.

   The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than 10 tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits and control measures no longer apply.

   It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

d. Additionally, once the U.S. EPA approves the December1, 2006 version of 3745-31-05, BAT requirements will not be applicable to the particulate emissions emitted from this emissions unit. BAT (under Senate Bill 265 changes) is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

e. OAC rule 3745-31-05(A)(3)(a)(ii) applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

   Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10 emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [See b)(2)b.]:

a. Use of baffles and water curtain control.

[OAC rule 3745-77-07(A)(1) and PTI #P0112051]

(2) The permittee shall install and operate the water curtain system for control of particulate emissions whenever this emissions unit is in operation and shall maintain the baffles and water curtain in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C), and PTI #P0112051]

(3) In the event the water curtain system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C), and PTI #P0112051]

(4) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11438(c), (d), and (e) | standards for new and existing sources |

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 63, Subpart RRRRRR, and PTI #P0112051]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baffles and water curtain control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C), and PTI #P0112051]

(2) The permittee shall conduct periodic inspections of the baffles and water curtain control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C), and PTI #P0112051]

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the baffles and water curtain control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C), and PTI #P0112051]

(4) The permittee shall document each inspection (periodic and annual) of the baffles and water curtain control system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C), and PTI #P0112051]

(5) The permittee shall maintain records that document any time periods when the baffles and water curtain control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the baffles and water curtain control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0112051]

(6) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baffles and water curtain system 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 baffles and water curtain system, on a daily basis.

Whenever the monitored value for the pressure drop deviates from the value 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 values 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 and/or scrubber water flow rate 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 pressure drop across the baffles and water curtain system shall be continuously maintained at a range of 1 to 6 inches of water.

The values are 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 values 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 values 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]

(7) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baffles and water curtain system controlling this emissions unit are the static pressure drop across the baffles and water curtain system, which was established in accordance with the manufacturer's recommendations. When the static pressure drop of the baffles and water curtain system show 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 e) 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 baffles and water curtain system shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

(8) 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, Part 64]

(9) 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, Part 64]

(10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart RRRRRR, including the following sections:

| | |
|---|---|
| 63.11440(b), (c) and (d) | monitoring requirements for new and existing sources |
| 63.11438(b) and 63.11442(a), (b), (c) and (d) | recordkeeping requirements |

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart RRRRRR, and PTI #P0112051]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any daily record showing that the baffles and water curtain control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0112051]

(2) 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 water curtain 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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

f) Testing Requirements

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

a. Emission Limitations: 1.04 lbs $PM_{10}$/hour and 4.56 tons $PM_{10}$/year

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly emission limitation as follows:

i. multiply the maximum quantity of glaze employed (87 gallons/hour) by the density of the glaze (14.0 pounds/gallon);

ii. multiply the value from f)(1)a.i. by the maximum solids content, by weight, of the glaze (0.65);

iii. multiply the value from f)(1)a.ii. by the transfer efficiency of this operation (1-0.86);

iv. multiply the value from f)(1)a.iii. by a control factor of (1-.99)*; and

v. enter the result from iv to USEPA's PM Calculator software to obtain $PM_{10}$ emissions.

*The estimated control efficiency of the water curtain is 99%.

If required, the methods to be employed to demonstrate compliance with the emission limitation shall be Methods 1 - 4, of 40 CFR, Part 60, Appendix A and Methods 201, 201A, 202 of 40 CFR, part 51, Appendix M.

The annual $PM_{10}$ limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0112051]

g) Miscellaneous Requirements

(1) None.

## 13. Emissions Unit Group -P002 and P011: P002,P011,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P002 | Clay Transfer System |
| P011 | Talc Duster Tanks |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | See b)(2)a. |
| b. | OAC rule 3745-17-11(B) | See b)(2)b. |

(2) Additional Terms and Conditions

a. These emissions units are 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.

b. The uncontrolled mass rate of particulate emissions from these emissions units are 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.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.