



Environmental Protection Agency

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

Certified Mail

1/18/2011

Joe Winch  
AS AMERICA, INC.-SALEM, OH PLANT  
605 S. Ellsworth Avenue  
Salem, OH 44460

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0215090011  
Permit Number: P0107369  
Permit Type: OAC Chapter 3745-31 Modification  
County: Columbiana

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Morning Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA-NEDO; Pennsylvania; West Virginia



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
AS AMERICA, INC.-SALEM, OH PLANT

Issue Date: 1/18/2011

Permit Number: P0107369

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Chapter 31 modification to R019 (increase in natural gas combustion emissions) due to correction in oven and furnace capacity, and to R012, R013 and R023 (increase in OC and VOC emissions limitations to provide flexibility). No increase in facility VOC emissions.

Facility ID: 0215090011

Facility Location: AS AMERICA, INC.-SALEM, OH PLANT  
605 S. Ellsworth Avenue,  
Salem, OH 44460

Facility Description: Plastics Plumbing Fixture Manufacturing, Enameled Iron and Metal Sanitary Ware Manufacturing

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Pamela Korenewych at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 or (330)425-9171. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AS AMERICA, INC.-SALEM, OH PLANT**

Facility ID:	0215090011
Permit Number:	P0107369
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/18/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
AS AMERICA, INC.-SALEM, OH PLANT

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 6
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 11
1. R012, Americast I System 1 Clamps #1 and #2 ..... 12
2. R013, Americast I System 2 Clamps #3 and #4 ..... 17
3. R019, Smallware Enamel Ground Coating Line ..... 22
4. R023, Americast I Admiral System Clamp #8..... 27





## Authorization

Facility ID: 0215090011

Application Number(s): M0001075

Permit Number: P0107369

Permit Description: Chapter 31 modification to R019 (increase in natural gas combustion emissions) due to correction in oven and furnace capacity, and to R012, R013 and R023 (increase in OC and VOC emissions limitations to provide flexibility). No increase in facility VOC emissions.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 1/18/2011

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

AS AMERICA, INC.-SALEM, OH PLANT  
605 S. Ellsworth Avenue  
Salem, OH 44460

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



Authorization (continued)

Permit Number: P0107369
Permit Description: Chapter 31 modification to R019 (increase in natural gas combustion emissions) due to correction in oven and furnace capacity, and to R012, R013 and R023 (increase in OC and VOC emissions limitations to provide flexibility). No increase in facility VOC emissions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

- Emissions Unit ID: R012
Company Equipment ID: Americast I System 1 Clamps #1 and #2
Superseded Permit Number: P0106958
General Permit Category and Type: Not Applicable
Emissions Unit ID: R013
Company Equipment ID: Americast I System 2 Clamps #3 and #4
Superseded Permit Number: P0106958
General Permit Category and Type: Not Applicable
Emissions Unit ID: R019
Company Equipment ID: Smallware Enamel Ground Coating Line
Superseded Permit Number: P0106958
General Permit Category and Type: Not Applicable
Emissions Unit ID: R023
Company Equipment ID: Americast I Admiral System Clamp #8
Superseded Permit Number: P0106958
General Permit Category and Type: Not Applicable



## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above. The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2). The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed

permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred. If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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. You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official. You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated. Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**Effective Date:** To be entered upon final issuance

modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2, B.3 and B.4.
2. The total emissions from all of the air contaminant sources at this facility (except those units that are defined as trivial by Ohio EPA DAPC Engineering Guide 62) shall not exceed the following emissions limitations for any rolling, 12-month period:
  - a) 95.0 tons of Volatile Organic Compounds (VOCs)
  - b) 9.50 tons of any single Hazardous Air Pollutant (HAP)
  - c) 24.50 tons of aggregate HAPs
3. At the end of each month, the permittee shall collect, calculate, and record the following information:
  - a) The actual rolling, 12-month summation of the VOC, Styrene, Toluene, (any single HAP), and aggregate HAPs emissions, calculated by adding the current month's emissions from all the air contaminant sources at this facility (except those units that are defined as trivial by Ohio EPA DAPC Engineering Guide 62) to the emissions for the preceding eleven calendar months.

The VOC emissions would be from all of the VOC containing (non-frit, i.e., non-borosilicate or non-porcelain enamel) coatings, resins, adhesives, mold cleaners, mold release agents, sealers, primers, solvents, and cleanup materials applied in all air contaminant sources at the facility.

1.12 tons of VOC emissions shall be added to the actual rolling, 12-month VOC emissions records, to represent the potential annual VOC emissions from the combustion of natural gas in the drying ovens, curing furnaces, and the thermal oxidizer, permitted in the following air contaminant sources: K001, R005, R008, R009, R018, R019, R020, and R022.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling, 12-month period during which the sum of the emissions from all of the air contaminant sources at this facility (except those units that are defined as trivial by Ohio EPA DAPC Engineering Guide 62) exceed any of the limitations in B.2.

These reports shall also include the probable cause of each deviation and the corrective action(s) taken to remedy the deviation(s).

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

**Effective Date:** To be entered upon final issuance

These reports shall be submitted (i.e., electronically via Air Service) quarterly to the Ohio EPA Northeast District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

## **C. Emissions Unit Terms and Conditions**



1. R012, Americast I System 1 Clamps #1 and #2

Operations, Property and/or Equipment Description:

Americast I System 1 Clamps 1 and 2.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c, d)(2), e)(1), f)(1)b

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing specific rules and their corresponding emission limitations.

(2) Additional Terms and Conditions

- a. The OC and VOC emissions are exclusively generated from the use of the mold release agents and mold cleaners. The process resins do not contain any "non-MDI" OCs or VOCs. MDI emissions from the use of process resins have been determined to be negligible.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)b.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for each material employed at this air contaminant source:
  - a. the company identification for each process resin, mold release agent, and mold cleaner employed;
  - b. the number of gallons or pounds of each mold release agent employed;
  - c. the number of gallons or pounds of each mold cleaner employed;
  - d. the OC and VOC content of each mold release agent employed, in pounds per gallon or in weight percent;
  - e. the OC and VOC content of each mold cleaner, in pounds per gallon or in weight percent;
  - f. the daily OC and VOC emissions from all mold release agents employed, in pounds per day, i.e., the sum of "b" x "d" for each mold release agent applied;

**Effective Date:** To be entered upon final issuance

- g. the daily OC and VOC emissions from all mold cleaner(s) employed prior to any credit for recovered materials, in pounds per day. Emissions from each mold cleaner will be calculated by one of two methods:

i. Material Balance Method

The daily OC and VOC emissions are the sum of "c" x "e" for each mold cleaner applied, for which the Material Balance Method of calculation is selected.

ii. Emission Factor Method

The daily OC and VOC emissions are the sum of "c" x "e" x "emission factor" for each mold cleaner applied, for which the Emission Factor Method is selected.

To qualify for the Emission Factor Method, the following two characteristics must apply:

- a. the mold cleaner is HAP-free (i.e., contains less than 1% HAPs);
- b. the primary ingredient in the mold cleaner is readily biodegradable, and it is properly characterized as a Semivolatile Organic Compound (i.e., a compound quantifiable by USEPA Method 8270 or Method 625, whether or not the ingredient is specifically listed in the Test Method).

To use the Emission Factor Method, the emission factor must be supported by experimental data, calculations, technical references or other supporting information.

If an emissions credit for recovered cleanup materials is desired, the VOC and OC emissions from recovered cleanup materials during the day may be subtracted from the daily VOC and OC emissions calculated above. The VOC and OC emissions from the recovered cleanup materials may also be calculated by one of the two methods above. The OC and VOC content of the recovered cleanup material shall be determined from the most recent lab test results from a representative sample of the recovered material.

- h. the total OC and VOC emissions from all materials applied during the day, i.e., sum of "f" + "g" above;
- i. the total number of hours the emissions unit was in operation, i.e., hours/day; and

the average hourly OC and VOC emission rates for all materials employed in this emissions unit, in pounds per hour, i.e., "h"/"i" for both pollutants.

- (2) The permittee shall collect and record the following information on a monthly basis:

- a. total VOC emissions, in lbs/month, calculated as the sum of the daily VOC emissions; and

- b. VOC emissions during a rolling, 12-month period, in tons/12-months, calculated by adding the current month's VOC emissions rate to the monthly sums of the preceding eleven calendar months. This sum is then converted to tons, by dividing by 2,000.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average VOC emissions from the emissions unit exceeded 2.50 pounds per hour and the actual average hourly VOC emissions for each such day; and
  - b. an identification of each month during which the rolling, 12-month VOC emissions from this emissions unit exceeded 10.95 tons.

These quarterly reports shall also include the probable cause of each deviation and the corrective action(s) taken to remedy the deviation(s).

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

These reports shall be submitted (i.e., electronically via Air Services) quarterly to the Ohio EPA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

2.50 pounds per hour (daily average) and 10.95 tons per year of OC emissions

- Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

- b. Emission Limitations:

2.50 pounds per hour (daily average) and 10.95 tons per rolling, 12-month period of VOC emissions



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for this air contaminant source.



2. R013, Americast I System 2 Clamps #3 and #4

Operations, Property and/or Equipment Description:

Americast I System 2 Clamps 3 and 4.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c, d)(2), e)(1), f)(1)b

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists OAC rules 3745-31-05(A)(3), 3745-21-07(G), and 3745-31-05(D)(1)(b) with their respective emission limitations and control measures.

(2) Additional Terms and Conditions

- a. The OC and VOC emissions are exclusively generated from the use of the mold release agents and mold cleaners. The process resins do not contain any "non-MDI" OCs or VOCs. MDI emissions from the use of process resins have been determined to be negligible.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)b.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for each material employed at this air contaminant source:
- a. the company identification for each process resin, mold release agent, and mold cleaner employed;
- b. the number of gallons or pounds of each mold release agent employed;
- c. the number of gallons or pounds of each mold cleaner employed;
- d. the OC and VOC content of each mold release agent employed, in pounds per gallon or in weight percent;
- e. the OC and VOC content of each mold cleaner, in pounds per gallon or in weight percent;
- f. the daily OC and VOC emissions from all mold release agents employed, in pounds per day, i.e., the sum of "b" x "d" for each mold release agent applied;

**Effective Date:** To be entered upon final issuance

- g. the daily OC and VOC emissions from all mold cleaner(s) employed prior to any credit for recovered materials, in pounds per day. Emissions from each mold cleaner will be calculated by one of two methods:

i. Material Balance Method

The daily OC and VOC emissions are the sum of "c" x "e" for each mold cleaner applied, for which the Material Balance Method of calculation is selected.

ii. Emission Factor Method

The daily OC and VOC emissions are the sum of "c" x "e" x "emission factor" for each mold cleaner applied, for which the Emission Factor Method is selected.

To qualify for the Emission Factor Method, the following two characteristics must apply:

- c. the mold cleaner is HAP-free (i.e., contains less than 1% HAPs);
- d. the primary ingredient in the mold cleaner is readily biodegradable, and it is properly characterized as a Semivolatile Organic Compound (i.e., a compound quantifiable by USEPA Method 8270 or Method 625, whether or not the ingredient is specifically listed in the Test Method).

To use the Emission Factor Method, the emission factor must be supported by experimental data, calculations, technical references or other supporting information.

If an emissions credit for recovered cleanup materials is desired, the VOC and OC emissions from recovered cleanup materials during the day may be subtracted from the daily VOC and OC emissions calculated above. The VOC and OC emissions from the recovered cleanup materials may also be calculated by one of the two methods above. The OC and VOC content of the recovered cleanup material shall be determined from the most recent lab test results from a representative sample of the recovered material.

- h. the total OC and VOC emissions from all materials applied during the day, i.e., sum of "f" + "g" above;
- i. the total number of hours the emissions unit was in operation, i.e., hours/day; and

the average hourly OC and VOC emission rates for all materials employed in this emissions unit, in pounds per hour, i.e., "h"/"i" for both pollutants.

- (2) The permittee shall collect and record the following information on a monthly basis:

- a. total VOC emissions, in lbs/month, calculated as the sum of the daily VOC emissions; and

- b. VOC emissions during a rolling, 12-month period, in tons/12-months, calculated by adding the current month's VOC emissions rate to the monthly sums of the preceding eleven calendar months. This sum is then converted to tons, by dividing by 2,000.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average VOC emissions from the emissions unit exceeded 2.50 pounds per hour and the actual average hourly VOC emissions for each such day; and
  - b. an identification of each month during which the rolling, 12-month VOC emissions from this emissions unit exceeded 10.95 tons.

These quarterly reports shall also include the probable cause of each deviation and the corrective action(s) taken to remedy the deviation(s).

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

These reports shall be submitted (i.e., electronically via Air Services) quarterly to the Ohio EPA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

2.50 pounds per hour (daily average) and 10.95 tons per year of OC emissions

- Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

- b. Emission Limitations:

2.50 pounds per hour (daily average) and 10.95 tons per rolling, 12-month period of VOC emissions



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for this air contaminant source.



3. R019, Smallware Enamel Ground Coating Line

Operations, Property and/or Equipment Description:

Smallware Department Enamel Ground Coat Line vented to 1 dust collector. This operation includes a spray booth, drying oven, and curing furnace.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(A)(3) | Emissions from this emissions unit shall not exceed the following limitations from process operations: particulate emissions (PE) shall not exceed 0.47 pound per hour and 2.07 tons per year from dust collector ES-07; visible particulate emissions shall not exceed 10% opacity as a 6-minute average; and Emissions from the combustion of natural gas in the drying oven and curing furnace shall not exceed the following limitations: volatile organic compound (VOC) emissions shall not exceed 0.04 pound per hour and 0.17 ton per year;



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 0.70 pound per hour and 3.07 tons per year; and  carbon monoxide (CO) emissions shall not exceed 0.59 pound per hour and 2.58 tons per year.
b.	OAC rule 3745-17-07	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-31-05(D)(1)(b)	See B.2, B.3 and B.4.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The permittee shall operate the dust collector (ES-07) whenever this emissions unit is in operation.
- (2) The pressure drop across the dust collector (ES-07) shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation.
- (3) The permittee shall burn only natural gas in the drying oven and curing furnace serving this emissions unit. The emissions from natural gas combustion are permitted at the potential usage of natural gas in all of the drying ovens contained in this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dust collectors were not in service while the emissions unit was in operation.

The permittee shall properly operate and maintain equipment to monitor the pressure drop across the dust collector (ES-07) while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis.

- (2) 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 the other fuel burned in this emissions unit.

- (3) At the end of each year the permittee shall collect and record the total tons of frit coatings applied in this emissions unit, to be used in the annual demonstration of compliance with the particulate emission limitation from overspray, by applying the annual tons of frit coating employed in the calculation of the estimated emissions contained in f).
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provide by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- 0.47 pound per hour of particulate emissions (total from dust collector ES-07)
- Applicable Compliance Method:
- This limit represents the estimated controlled potential emissions of this emissions unit, calculated as follows:
- $(90 \text{ parts/hr}) \times (3.0 \text{ lbs coat/part}) \times (100\% - 30\% \text{TE}) \times (25\% \text{ to filter}^*) \times (100\% - 99.0\% \text{ control for ES-07}) = 0.47 \text{ lbs/hr}$
- If required by the Ohio EPA, compliance with the allowable particulate emission limitation shall be determined in accordance with U.S. EPA Reference Methods 1 through 5 of 40 CFR Part 60, Appendix A.
- \* it is estimated that a minimum of 75% of the overspray is collected in the reclaim trough
- b. Emission Limitation:
- 2.07 tons per year of particulate emissions (total from dust collector ES-07)
- Applicable Compliance Method:
- The annual emission limitation is based on the allowable hourly emission rate (0.47 lb/hr) multiplied by the maximum possible operating hours (8,760 hrs/yr), and divided by 2,000 lbs/ton. In order to demonstrate compliance with the annual particulate emission limitation from frit coatings, the following calculation shall be performed at the end of each year:
- $PE = (FC \times 70\% \text{ overspray} \times 25\% \text{ to filter} \times 1\% \text{ lost from filter})$

where:

PE = total estimated particulate emissions from overspray, in tons of PE per year

FC = total annual frit coating usage in this emissions unit, in tons per year

c. Emission Limitations, from natural gas combustion:

0.04 pound per hour of VOC emissions;  
0.70 pound per hour of NO<sub>x</sub> emissions; and  
0.59 pound per hour of CO emissions

Applicable Compliance Method:

Compliance with the hourly emission limitations from natural gas combustion may be demonstrated by multiplying the appropriate AP-42 emission factors from "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98) for natural gas, by the maximum hourly natural gas usage rate of the drying oven and curing furnace (total of 7,000 ft<sup>3</sup>/hr). If required, the permittee shall demonstrate compliance with the hourly emission limitations in accordance with the appropriate U.S. EPA test methods specified in 40 CFR Part 60, Appendix A.

d. Emission Limitations, from natural gas combustion:

0.17 ton per year of VOC emissions;  
3.07 tons per year of NO<sub>x</sub> emissions; and  
2.58 tons per year of CO emissions

Applicable Compliance Method:

The annual emission limitations are based on the allowable hourly emission rates multiplied by the maximum possible operating hours (8,760 hrs/yr), and divided by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitations, compliance will also be shown for the annual emission limitations.

e. Emission Limitation:

10% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(1) or other U.S. EPA approved test method with prior approval from the Ohio EPA.

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

- (1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for this air contaminant source.



4. R023, Americast I Admiral System Clamp #8

Operations, Property and/or Equipment Description:

Americast I Admiral System Clamp 8.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c, d)(2), e)(1), f)(1)b

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing specific rules and their corresponding emission limitations.

(2) Additional Terms and Conditions

- a. The OC and VOC emissions are exclusively generated from the use of the mold release agents and mold cleaners. The process resins do not contain any "non-MDI" OCs or VOCs. MDI emissions from the use of process resins have been determined to be negligible.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)b.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for each material employed at this air contaminant source:
- a. the company identification for each process resin, mold release agent, and mold cleaner employed;
- b. the number of gallons or pounds of each mold release agent employed;
- c. the number of gallons or pounds of each mold cleaner employed;
- d. the OC and VOC content of each mold release agent employed, in pounds per gallon or in weight percent;
- e. the OC and VOC content of each mold cleaner, in pounds per gallon or in weight percent;
- f. the daily OC and VOC emissions from all mold release agents employed, in pounds per day, i.e., the sum of "b" x "d" for each mold release agent applied;

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- g. the daily OC and VOC emissions from all mold cleaner(s) employed prior to any credit for recovered materials, in pounds per day. Emissions from each mold cleaner will be calculated by one of two methods:

i. Material Balance Method

The daily OC and VOC emissions are the sum of "c" x "e" for each mold cleaner applied, for which the Material Balance Method of calculation is selected.

ii. Emission Factor Method

The daily OC and VOC emissions are the sum of "c" x "e" x "emission factor" for each mold cleaner applied, for which the Emission Factor Method is selected.

To qualify for the Emission Factor Method, the following two characteristics must apply:

- e. the mold cleaner is HAP-free (i.e., contains less than 1% HAPs);
- f. the primary ingredient in the mold cleaner is readily biodegradable, and it is properly characterized as a Semivolatile Organic Compound (i.e., a compound quantifiable by USEPA Method 8270 or Method 625, whether or not the ingredient is specifically listed in the Test Method).

To use the Emission Factor Method, the emission factor must be supported by experimental data, calculations, technical references or other supporting information.

If an emissions credit for recovered cleanup materials is desired, the VOC and OC emissions from recovered cleanup materials during the day may be subtracted from the daily VOC and OC emissions calculated above. The VOC and OC emissions from the recovered cleanup materials may also be calculated by one of the two methods above. The OC and VOC content of the recovered cleanup material shall be determined from the most recent lab test results from a representative sample of the recovered material.

- h. the total OC and VOC emissions from all materials applied during the day, i.e., sum of "f" + "g" above;
- i. the total number of hours the emissions unit was in operation, i.e., hours/day; and

the average hourly OC and VOC emission rates for all materials employed in this emissions unit, in pounds per hour, i.e., "h"/"i" for both pollutants.

- (2) The permittee shall collect and record the following information on a monthly basis:

- a. total VOC emissions, in lbs/month, calculated as the sum of the daily VOC emissions; and

- b. VOC emissions during a rolling, 12-month period, in tons/12-months, calculated by adding the current month's VOC emissions rate to the monthly sums of the preceding eleven calendar months. This sum is then converted to tons, by dividing by 2,000.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average VOC emissions from the emissions unit exceeded 1.25 pounds per hour and the actual average hourly VOC emissions for each such day; and
  - b. an identification of each month during which the rolling, 12-month VOC emissions from this emissions unit exceeded 5.48 tons.

These quarterly reports shall also include the probable cause of each deviation and the corrective action(s) taken to remedy the deviation(s).

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

These reports shall be submitted (i.e., electronically via Air Services) quarterly to the Ohio EPA by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

- 1.25 pounds per hour (daily average) and 5.48 tons per year of OC emissions

- Applicable Compliance Method:

- Compliance shall be based upon the record keeping requirements specified in d)(1).

- b. Emission Limitations:

- 1.25 pounds per hour (daily average) and 5.48 tons per rolling, 12-month period of VOC emissions



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) The requirements of this Federally Enforceable Permit-to-Install and Operate (FEPTIO) shall supersede the requirements contained in all previous air permits issued for this air contaminant source.