State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
ASHLAND COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17350
Fac ID: 0303000002
DATE: 10/30/2007

Mansfield Plumbing Products LLC
Dave Shook
PO Box 620 150 First Street
Perrysville, OH 44864

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 10/30/2007**
Terms and Conditions	**Effective Date: 10/30/2007**

FINAL PERMIT TO INSTALL 03-17350

Application Number:	03-17350
Facility ID:	0303000002
Permit Fee:	**$1075**
Name of Facility:	Mansfield Plumbing Products LLC
Person to Contact:	Dave Shook
Address:	PO Box 620 150 First Street Perrysville, OH 44864

Location of proposed air contaminant source(s) [emissions unit(s)]:
150 First Street
Perrysville, **Ohio**

Description of proposed emissions unit(s):
Natural gas fired kiln (kiln no.2 and administrative modification to P043 (kiln no.10) established in PTI 03-8326 and to P047 (kiln no.4) established in PTI 03-17194.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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, 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then 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 are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing

of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

If no 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 (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PM10	19.50
NOx	17.52
CO	131.45
OC	17.13

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Emissions Unit ID: P033

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P033) - natural gas fired kiln no.2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	1.65 lbs carbon monoxide (CO)/hr; 7.23 tons CO/year Visible particulate emissions shall not exceed 20% opacity, as a six-minute average See A.I.2.a
OAC rule 3745-17-07(A)	See A.I.2.b
OAC rule 3745-17-11(B)	See A.I.2.c
OAC rule 3745-18-06	See A.I.2.d
OAC rule 3745-21-08(B)	See A.I.2.e

2. Additional Terms and Conditions

2.a Best available technology (BAT) control 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 oxide (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.

2.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.

2.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.

2.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.

2.e The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

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

III. 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.

IV. 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.

V. Testing Requirements

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

   a. <u>Emission Limitation:</u>
   1.65 lbs CO/hr; 7.23 tons CO/year

   <u>Applicable Compliance Method:</u>

Emissions Unit ID: P033

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 this limitations. If required, the permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 18, 25, or 25A 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.

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.

VI. Miscellaneous Requirements

None

Issued: 10/30/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P033) - natural gas fired kiln no.2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See B.VI.1

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. 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 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.

Issued: 10/30/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P043) - natural gas fired kiln no.10 (administrative modification to PTI 03-8326, issued 2/8/95 to revise emission limitations based on updated emission factors)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.70 lbs particulate matter less than 10 microns in size(PM10)/hr; 11.83 tons PE/year (See A.I.2.a) 2.42 lbs nitrogen oxide (NOx)/hr; 10.60 tons NOx/year 18.2 lbs carbon monoxide (CO)/hr; 79.72 tons CO/year 2.37 lbs organic compounds (OC)/hr; 10.38 tons OC/year Visible particulate emissions shall not exceed 20% opacity, as a six-minute average See A.I.2.b
OAC rule 3745-17-07(A)	See A.I.2.c
OAC rule 3745-17-11(B)	See A.I.2.d
OAC rule 3745-18-06	See A.I.2.e
OAC rule 3745-21-08(B)	See A.I.2.f

2. Additional Terms and Conditions

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

2.b Best available technology (BAT) control 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.

2.c 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.

2.d 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.

2.e 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.

2.f The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

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

III. 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.

IV. 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.

V. Testing Requirements

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

   a. Emission Limitation:
   2.70 lbs PM10/hr; 11.83 tons PM10/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 this limitation. 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 hourly potential to emit is based on 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. 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.

   b. Emission Limitation:
   2.42 lbs NOx/hr; 10.60 tons NOx/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 this limitations. 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 hourly potential to emit is based on the maximum hourly process capacity of 5.50 tons and a vendor supplied emission factor of 0.44 lb NOx/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.

c. Emission Limitation:
18.2 lbs CO/hr; 79.72 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 this limitations. 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 hourly potential to emit is based on 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. 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.

d. Emission Limitation:
2.37 lbs OC/hr; 10.38 tons OC/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 this limitations. 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 hourly potential to emit is based on 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. 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.

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.

VI. Miscellaneous Requirements

None

Issued: 10/30/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P043) - natural gas fired kiln no.10 (administrative modification to PTI 03-8326, issued 2/8/95 to revise emission limitations based on updated emission factors)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 10/30/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P047) - natural gas fired kiln no.4 (administrative modification to PTI 03-17194, issued 10/17/06 to revise emission limitation based on updated emission factors)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	11.81 lbs carbon monoxide (CO)/hr; 51.73 tons CO/year Visible particulate emissions shall not exceed 20% opacity, as a six-minute average See A.I.2.a
ORC 3704.03(T)(4)	See A.I.2.b
OAC rule 3745-17-07(A)	See A.I.2.c
OAC rule 3745-17-11(B)	See A.I.2.d
OAC rule 3745-18-06	See A.I.2 e
OAC rule 3745-21-08(B)	See A.I.2.f

2. Additional Terms and Conditions

2.a Best available technology (BAT) control 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.

2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxide (NOx), organic compound (OC) particulate matter less than 10 microns in size (PM10), and sulfur dioxide (SO2) emissions from this air contaminant source since the uncontrolled potential to emit (PTE) for these pollutants is less than ten tons per year.

The PTE for NOx from this emissions unit is 6.92 tons per year, the PTE for OC is 6.75 tons per year, the PTE for PM10 is 7.67 tons per year and the PTE for SO2 is 0.70 ton per year. The PTE for these pollutants is based on the maximum hourly process capacity of 3.58 tons, a maximum operating schedule of 8760 hours per year, a conversion factor of 1 ton per 2000 lbs and the following emission factors:

0.44 lb NOx/ton (based on vendor data)

0.43 lb OC/ton [based on AP-42, Table 11.7-1 (7/96)]

0.49 lb PE/ton* [based on AP-42, Table 11.7-1 (7/96)]

0.045 lb SO2/ton [based on AP-42, Table 11.7-1 (7/96)]

*All PE are assumed to be PM10

2.c 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.

2.d 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.

2.e The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.f The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

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

III. 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.

IV. 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.

V. Testing Requirements

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

   a. <u>Emission Limitation:</u>
   11.81 lbs CO/hr; 51.73 tons CO/year

   <u>Applicable Compliance Method:</u>
   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 this limitations. 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 hourly potential to emit is based on the maximum hourly process capacity of 3.58 tons and an AP-42, Table 11.7-1 (7/98)emission factor of 3.3 lb 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.

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

   <u>Applicable Compliance Method:</u>
   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.

VI. Miscellaneous Requirements

None

Issued: 10/30/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P047) - natural gas fired kiln no.4 (administrative modification to PTI 03-17194, issued 10/17/06 to revise emission limitation based on updated emission factors)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None