

Synthetic Minor Determination and/or Netting Determination

Permit To Install ~~03-13981~~

A. Source Description

This facility does brass castings. The company is proposing to rebuild their Ajax Brass Induction Furnace (originally P006). For purposes of permitting, this furnace will be considered a new source (P904). Mansfield Plumbing Products is a Title V facility.

B. Facility Emissions and Attainment Status

This facility is Title V and chooses to restrict their emissions to below PSD thresholds. Sandusky county is in attainment for all criteria pollutants.

C. Source Emissions

Mansfield Plumbing has requested Federally enforceable emission limits restricting the potential to emit for the Brass Induction Furnace to the following rolling, 12-month limits:

<u>Pollutant</u>	<u>Tons Per Rolling, 12-Month Period</u>
fugitive PE	0.94
stack PE	8.48
fugitive lead	0.03
stack lead	0.30

D. Conclusion

This PTI establishes restricted fugitive and stack PE and fugitive and stack lead emission limits for the Brass Induction Furnace in order for the company to avoid PSD thresholds.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
ASHLAND COUNTY

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 03-13981

DATE: 6/5/2003

Mansfield Plumbing Products Inc
Mary Schalmo
PO Box 620 150 First Street
Perrysville, OH 44864

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO

**ASHLAND
COUNTY**

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-13981 FOR AN AIR CONTAMINANT SOURCE FOR
MANSFIELD PLUMBING PRODUCTS INC**

On 6/5/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mansfield Plumbing Products Inc**, located at **150 East First Street, Perrysville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13981:

Brass induction furnace.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-13981

Application Number: 03-13981
APS Premise Number: 0303000166
Permit Fee: **To be entered upon final issuance**
Name of Facility: Mansfield Plumbing Products Inc
Person to Contact: Mary Schalmo
Address: PO Box 620 150 First Street
Perrysville, OH 44864

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

Description of proposed emissions unit(s):
Brass induction furnace.

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

Director

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 quarterly, i.e., 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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.

Mansfield Plumbing Products Inc

Facility ID: 0303000166

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Issued: To be entered upon final issuance

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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 this Permit To Install.

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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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

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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 To Install 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.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 quarterly, i.e., 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. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install 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.

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5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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., 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
stack PE	8.48
fugitive PE	0.94
stack lead	0.03
fugitive lead	0.30

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Mansfield Plumbing Products Inc

PTI Application: 02 12091

Issued

Facility ID: 0303000166

Emissions Unit ID: P904

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

Mansi
PTI A

Emissions Unit ID: P904

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>OAC rule 3745-17-08 (A)</u>
P904 - Electric brass induction furnace.	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-07 (B)

OAC rule 3745-31-05 (D)

OAC rule 3745-17-11 (B)

OAC rule 3745-17-07 (A)

Mansi**PTI A**

Emissions Unit ID: P904

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Applicable Emissions
Limitations/Control
Measures

See A.I.2.h.

stack emissions:

5.80 lbs particulate emissions

(PE)/hr

0.18 lb lead/hr

There shall be no visible
 fugitive emissions from the
 building enclosure.

Visible particulate emissions
 from the stacks shall not
 exceed 10% opacity as a
 six-minute average.

See A.I.2.a., A.I.2.b., and
 A.I.2.c.

fugitive emissions:

0.94 tons PE per rolling,

12-month period

0.03 ton lead per rolling,

12-month period

stack emissions:

8.48 tons PE per rolling,

12-month period

0.30 ton lead per rolling,

12-month period

See A.I.2.d.

See A.I.2.e.

See A.I.2.f.

See A.I.2.g.

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Mansi

PTI A

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Emissions Unit ID: P904

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** All particulate emissions are considered to be particulate matter less than 10 microns in size (PM₁₀).
- 2.b** Best Available Technology (BAT) for this emissions unit has been determined to be compliance with the Terms and Conditions of this permit and the use of brass ingots with a lead concentration not greater than 7%, by weight.
- 2.c** All particulate emissions are assumed to be particulate matter less than 10 µm in size (PM₁₀).
- 2.d** The permittee has requested federally enforceable emission limitations for their electric induction furnace of 0.94 ton fugitive PE, 8.48 tons stack PE, 0.03 ton fugitive lead, and 0.30 ton stack lead per rolling, 12-month period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.
- 2.e** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Ashland County.
- 2.f** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A), pursuant to OAC rule 3745-17-07 (A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.g** Mansfield Plumbing Products is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B)(1).
- 2.h** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B), pursuant to OAC rule 3745-17-07 (B)(11)(e), because the emissions unit is not subject to the requirements of OAC rule 3745-17-08 (A).

II. Operational Restrictions

- 1. The maximum annual brass throughput rate for this emissions unit shall not exceed 6,500 tons per rolling, 12-month period.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the throughput rates specified in the following table:

Mansfield Plumbing Products Inc

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Emissions Unit ID: P904

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Maximum Allowable Cumulative Brass Throughput Rates (tons)

<u>Month(s)</u>	<u>Throughput</u>
1-1	542
1-2	1084
1-3	1626
1-4	2168
1-5	2710
1-6	3252
1-7	3794
1-8	4336
1-9	4878
1-10	5420
1-11	5962
1-12	6500

After the first 12 calendar months of operation, compliance with the annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

2. The permittee shall only charge clean brass ingots, which have a lead concentration of no more than 7%, by weight, in this emissions unit. In addition, the permittee may reprocess gates, risers, casting cutoffs, etc. that are generated in plant.

III. Monitoring and/or Recordkeeping Requirements

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

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brass, with an applied 90% capture efficiency; and

- f. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month brass throughput rate, fugitive and stack PE emission rates and, fugitive and stack lead emission rates, in tons.
2. The permittee shall maintain records, from the ingot supplier, documenting the lead concentration (percent by weight) of the brass ingots charged in this emissions unit.
 3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from the building used to enclose this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the cause of the emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
 4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not

Emissions Unit ID: P904

have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of brass ingots with a lead concentration greater than 7%, by weight. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the maximum brass throughput rates that are specified in Section A.II.1.
3. After the first 12 calendar months of operation, the permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the following rolling, 12-month limitations:
 - a. brass throughput of 6,500 tons
 - b. 0.94 tons fugitive PE;
 - c. 8.48 tons stack PE;
 - d. 0.03 ton fugitive lead; and
 - e. 0.30 ton stack lead.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive emissions were observed from the building used to this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

**Mansi
PTI A**

Emissions Unit ID: P904

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1. Compliance with the emission limitations specified in Section A.I.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: stack
5.80 lbs PE/hr

Issued: To be entered upon final issuanceApplicable Compliance Method:

The hourly emission limitation represents the emission unit's *potential to emit. Therefore, no monitoring, recordkeeping, and/or reporting requirements are required to demonstrate compliance.

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

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

Applicable Compliance Method:

The hourly emission limitation represents the emission unit's *potential to emit. Therefore, no monitoring, recordkeeping, and/or reporting requirements are required to demonstrate compliance.

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

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

Applicable Compliance Method:

This emission limitation was developed by multiplying the company supplied emission factor of 2.90 lbs PE/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied fugitive loss of 10%. Compliance with this emission limitation will be demonstrated in accordance with the recordkeeping requirements specified in Section A.III.

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

Applicable Compliance Method:

This emission limitation was developed by multiplying the company supplied emission factor of 0.10 lb Pb/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied fugitive loss of 10%. Compliance with this emission limitation will be demonstrated in accordance with the recordkeeping requirements specified in Section A.III.

Mansfield Plumbing Products Inc

PTI Application: 02 12091

Issued

Facility ID: 0303000166

Emissions Unit ID: P904

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

Issued: To be entered upon final issuanceApplicable Compliance Method:

The annual emission limitation was developed by multiplying the company supplied emission factor of 2.90 lbs PE/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied capture efficiency of 90%. Compliance with this emission limitation will be demonstrated in accordance with the recordkeeping requirements specified in Section A.III.

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

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the company supplied emission factor of 0.10 lb Pb/ton brass by the restricted throughput of 6500 tons brass/yr, with an applied capture efficiency of 90%. Compliance with this emission limitation will be demonstrated in accordance with the recordkeeping requirements specified in Section A.III.

- g. Emission Limitation: fugitive
There shall be no visible fugitive emissions from the building enclosure.

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: P904

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P904 - Electric brass induction furnace.	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