



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
ASHLAND COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 03-13981

Fac ID: 0303000166

DATE: 9/20/2005

Mansfield Plumbing Products Inc
Mary Schalmo
150 East First Street
Perrysville, OH 44864

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA

NWDO



Permit To Install
Terms and Conditions

Issue Date: 9/20/2005
Effective Date: 9/20/2005

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13981

Application Number: 03-13981
Facility ID: 0303000166
Permit Fee: **\$0**
Name of Facility: Mansfield Plumbing Products Inc
Person to Contact: Mary Schalmo
Address: 150 East 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):

Ajax electric brass induction furnace.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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

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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.8 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.

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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

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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.

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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.

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- 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

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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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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.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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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

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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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| Stack PE | 8.48 |
| Fugitive PE | 0.94 |
| Stack lead | 0.30 |
| Fugitive lead | 0.03 |

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Emissions Unit ID: ***P905***

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

Mans'

PTI A

Modification Issued: 9/20/2005

Emissions Unit ID: **P905**

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> |
|---|--------------------------------------|
| P905 - Ajax Electric brass induction furnace | OAC rule 3745-17-11 (B) |
| | OAC rule 3745-31-05 (A)(3) |
| | OAC rule 3745-17-07 (A) |
| | OAC rule 3745-17-08 (A) |
| | OAC rule 3745-17-07 (B) |
| | OAC rule 3745-31-05 (D) |

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Emissions Unit ID: **P905**

Applicable Emissions
Limitations/Control
Measures

stack emissions:

5.22 lbs particulate
emissions (PE)/hr

0.18 lb lead/hr

There shall be no visible
fugitive emissions from
the building enclosure
that are associated with
this emissions unit.

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

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

fugitive emissions:

0.94 ton 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.c.

See A.I.2.d.

See A.I.2.e.

See A.I.2.f.

See A.I.2.g.

Modification Issued: 9/20/2005**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, a building enclosure, and the use of brass ingots with a lead concentration not greater than 7%, by weight.
- 2.c** 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.d** 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.e** 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.f** 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.g** 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.

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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:

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 Record keeping 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 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 weekly 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 weekly 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 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 ton fugitive PE;
 - c. 8.48 tons stack PE;
 - d. 0.03 ton fugitive lead; and
 - e. 0.30 ton stack lead.

Mans'**PTI A****Modification Issued: 9/20/2005**Emissions Unit ID: **P905**

4. The permittee shall submit semiannual written reports which (a) identify all weeks 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 weeks 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

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
5.22 lbs PE/hr

Applicable Compliance Method:

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

*The hourly potential to emit was developed by multiplying the company supplied

Emissions Unit ID: **P905**

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 record keeping 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 record keeping requirements specified in Section A.III.

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

Applicable 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 record keeping 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 record keeping requirements specified in Section A.III.

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- g. Emission Limitation: fugitive
There shall be no visible fugitive emissions from the building enclosure that are associated with this emissions unit.

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

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> |
|---|--------------------------------------|--|
| P905 - Ajax Electric brass induction furnace. | None | None |

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Emissions Unit ID: ***P905***

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None