OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1173
TOXIC REVIEW

CERTIFIED MAIL

July 19, 1995

METROPOLITAN INDUSTRIES INC.
PHILLIP MCGUINESS
P.O. BOX 9240
CANTON, OH 44711

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 by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-1173
APS Premise No. 1576051149
Permit Fee: $600.00

Name of Facility: METROPOLITAN INDUSTRIES INC.

Person to Contact: PHILLIP MCGUINESS

Address: P.O. BOX 9240
CANTON, OH 44711

Location of proposed source(s): 1201 MILLERTON ST. SE
CANTON, OHIO

Description of proposed source(s):
NATURAL GAS FIRED TILE TUNNEL KILN.

Date of Issuance: July 19, 1995

Effective Date: July 19, 1995

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for METROPOLITAN INDUSTRIES INC. located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P014	Natural gas fired tile tunnel kiln; kiln #4	Limit of sulfur content in raw materials; natural gas usage; 45 meter high stack	3745-31-05 3745-17-07 3745-17-11 3745-18-06 (D)(1)	14.65 lbs SO_2/hr *76.65 lbs SO_2/hr 3.65 lbs PM/hr *21.65 lbs PM/hr 1.63 lbs FL/hr *6.5 lbs FL/hr .148 lb CO/hr .48 lb VOC/hr 3.24 lbs NO_x/hr *16.06 lbs NO_x/hr

*Total allowable from sources P004, P005, P006 and P014.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
SO_2	61.53
SO_2	*306.53
PM	15.3
PM	*94.14
FL	6.8
FL	*28.47
NO_x	13.61
NO_x	*69.61
CO	.62
VOC	2.02

*Total allowable from sources P004, P005, P006 and P014.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Daily samples will be taken of the raw materials (clay and shale) used in tile production. A composite sample, accumulated from a seven day period, will be analyzed to determine the weekly weighted average sulfur content of the raw materials used to make tile that week. Each week this procedure should be repeated.

   The total amount of sulfur in the raw materials used in P004, P005, P006 and P014 shall not exceed 7,557 lbs. in any one week. This amount of sulfur will be determined by multiplying the tons of raw material (dry weight) used in a week times the weekly weighted average sulfur content of the raw materials.

   The total amount of sulfur in the raw materials used in P004, P005, P006 and P014 shall not exceed 98,246 lbs. in any one quarter. This number was arrived at using this calculation:

306.53 tons SO_2/year x 2000 lbs/ton = 613,000 lbs SO_2/year
613,060 lbs SO_2/year divided by 2 = 306,530 lb S/year
$S + O_2 = SO_2$ [32 + 2(16) = 64]
306,530 lbs S/year divided by 0.78 (22%) of S retained in final product) = 392,987 lbs S/year.
392,987 lbs S/year divided by 4(4 quarters in year) = 98,247 lbs S/quarter

This amount of sulfur will be determined by multiplying the tons of raw material (dry weight) times the quarterly weighted average of the raw materials. This facility shall maintain records of the following:

- Weekly weighted average sulfur content of raw materials in percent;
- Weekly production rate for each kiln;
- Weekly weight of sulfur in raw materials in tons; and
- Quarterly weight of sulfur in raw materials in tons.

These records shall be retained in the facility files for at least two (2) years and shall be made available for inspection upon request of the Director or any authorized representative of the Director during normal business hours.

This facility shall submit quarterly reports to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702, which lists:

- Weekly weighted average sulfur content of raw materials in percent;
- Weekly production rate for each kiln;
- Weekly weight of sulfur in raw materials in tons; and
- Quarterly weight of sulfur in raw materials in tons.

These quarterly reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter.

2. The stack servicing kilns P004, P005, P006 and P014 shall be a minimum height of 45 meters from ground level.

3. The only fuel used in these sources shall be natural gas.

4. The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source:

3745-31-05
3745-17-07
3745-17-11
3745-18-06(D)(1)

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

5. The combined emissions from sources P004 (Kiln #1), P005 (Kiln #2), P006 (Kiln #3) and P014 (Kiln #4), shall not exceed the following:

76.65 lbs SO_2/hr	6.5 lbs FL/hr	69.61 tons NO_x/yr
12,877 lbs SO_2/wk	28.47 ton FL/yr	21.65 lbs PM/hr
306.53 tons SO_2/yr	16.06 lbs NO_x/hr	94.14 tons PM/yr

* Both gaseous and particulate fluorides as captured by Test Method 13A.

6. <u>Performance Test Requirement</u>

The permittee shall conduct, or have conducted, within six months of the expiration of this Permit to Operate, performance testing on the air contaminant sources in accordance with procedures approved by the agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

A completed Intent to Test notification form shall be submitted to the Canton City Health Department, Division of Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702-1544. This notice shall be made thirty (30) days in advance and shall specify the source operating parameters, the proposed test procedures and the time, date, place and person(s) conducting such tests.

Two copies of the test results shall be submitted within thirty (30) days after the completion of the performance test.

Tests shall be performed for the following sources and pollutants:

Source:	Pollutants
P004, P005, P006 and P014	SO_2, FL, NO_x, PM

Test Method 13A should be employed to measure FL emissions.

Test Method 6 should be employed to measure SO_2 emissions. This test shall be run with all four kilns (#1, #2, #3 and #4) operating. This test shall be run at or near the maximum production capacity of all four kilns.

This stack test shall include an analysis of the sulfur content of the raw materials (clay and shale).