

FIRST-TIME TITLE V AIR PERMIT REVIEW

APPLICANT: Leviton Manufacturing Company, Inc. – Southern Devices Division	SITE LOCATION: Morganton	COUNTY: Burke	
TECHNICAL CONTACT: Misty Branch	PHONE: (828) 584-1611	RESPONSIBLE OFFICIAL: Leonard Causby	TITLE: Plant Manager
REVIEW ENGINEER: Mark Cuilla	SIGNATURE:	DATE: XXXXXX, 2003	
REGIONAL CONTACT: Brendan Davey	REGIONAL OFFICE: ARO	SIC CODE: 3643	
APPLICATION NUMBER: 1200058.01A	EXISTING PERMIT NUMBER: 01889R15	NEW PERMIT NUMBER: 01889T16	

I Introduction/Purpose of Application

This first time Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

II History and Permit Application Background Information

May 7, 1998 – Permit revision 01889R14 issued for the replacement of an existing bagfilter with a larger dust collector. The facility is classified as a synthetic minor facility.

September 11, 2001 – Title V permit application (App No. 1200058.01A) received. Assigned to Mrs. Jenny Sheppard, DAQ HQ for processing.

December 21, 2001 – Permit revision 01889R15 issued. Application was made at that time for renewal of permit 01889R14, the addition and deletion of miscellaneous equipment, the request for the use of No. 2 fuel oil as a backup fuel for the old kiln, and for the reclassification of the facility from synthetic minor to title V. Per the Asheville Regional Offices review:

“The facility has not conducted a specific modification to increase emissions to become a title V facility. Based on the uncertainty of kerosene (VOC) emissions data, the Company has agreed to conservatively calculate their VOC/kerosene emissions based on a true mass balance. Previously, it was theorized that some kerosene used in the wet clay mixture was destroyed in the kilns but could not be accurately quantified. A PSD avoidance condition is included to ensure the facility can remain a PSD minor source based on the new method of emissions calculations.”

April 24, 2002 – Permit application reassigned to Mr. Jay Evans, DAQ HQ for processing.

April 8, 2003 – Permit application reassigned to Mr. Mark Cuilla, DAQ HQ for processing.

July 3, 2003 – Sent DRAFT permit to regional office, title V coordinator, and facility for review and comment prior to sending to public notice.

July 9, 2003 – Received ARO comments on DRAFT permit. See Section XIV of this document for a discussion.

July 15, 2003 – Received facility’s comments on DRAFT permit. See Section XIV of this document for a discussion.

III. Facility Description

The facility manufactures electrical wiring devices. Ceramic, metal and thermoset plastic parts are manufactured and assembled at the facility. The facility blends materials, presses parts, and dries parts in dryers and kilns. If needed the facility also has the ability to add glazing material prior to the drying operations.

IV. Statement of Compliance

The facility was last inspected by Mr. Brendan Davey of the Asheville Regional Office on March 10, 2003. At that time Mr. Davey notice excessive dust escaping from bagfilter (ID No. C1) installed on the ceramics mixer/conveyor. A Notice of Violation was sent to the facility on March 19, 2003, citing a violation of general condition B.6.

Except as noted above, the facility appeared to be in compliance with the applicable air quality regulations and conditions of the air quality permit.

V. Summary of Emission Sources and Control Devices

The following table reflects the current permitted sources and control devices at the facility.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Clay/Ceramic Material Handling and Processing			
CRM-MP-CSS	Six clay storage silos (16.7 tons per hour total maximum process rate)	S1	Bagfilter (904 square feet of filter area; cartridge/pulse jet)
CRM-MP-CWB	Clay Weigh Bin (6,600 pounds per hour maximum process rate)	M1	Bagfilter (181 square feet of filter area; shaker)
CRM-MP-RC1	Ceramics Mixer/Conveyor (11,475 pounds per hour maximum process rate)	C1	Bagfilter (603 square feet of filter area; shaker)
CRM-MP-PRS	Ceramic Presses	NA	NA
CRM-GZ-PBS	Three polishing brush stations (6,993 pounds per hour ceramic parts maximum process rate)	NA	NA
CRM-GZ-GSB-1 CRM-GZ-GSB-3 CRM-GZ-GSB	Two glaze spray booths and one lab glaze spray booth (4,662 pounds per hour ceramic parts and 840 pounds per hour glaze maximum process rate)	KC1 and KC3 C1	Two knockdown chains installed one each on two glaze spray booths One bagfilter (603 square feet of filter area; shaker) installed on lab booth
CRM-D-W	Ceramics Wheelabrator (4,320 pounds per hour kiln-fired parts and 50 pounds per hour burnishing media maximum process rate)	W1	Bagfilter (500 square feet of filter area; shaker)

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Ceramic Kilns and Dryers			
CRM-D-ND	One natural gas-fired dryer (5.0 million Btu per hour maximum heat input rate; 2,016 pounds per hour maximum process rate)	NA	NA
CRM-D-NK	One natural gas-fired ceramic tunnel kiln (14.0 million Btu per hour maximum heat input rate; 4,032 pounds per hour maximum process rate)	NA	NA
Plastics Department			
CM-CM1	Compression Molding Burnishing consisting of two wheelabrators and one Hunzinger (1,088 pounds per hour plastic parts and 15 pounds per hour burnishing media maximum process rate)	B2	Bagfilter (301 square feet of filter area; shaker)
CM-PRS	34 Compression Molding Presses (1,088 pounds per hour maximum process rate)	NA	NA
Other			
MF-FUG	Metal Fabrication Metalworking Fluids	NA	NA
BLR-1	One natural gas/No. 2 fuel oil-fired boiler (9.4 million Btu per hour maximum heat input rate)	NA	NA
BLR-2	One natural gas/No. 2 fuel oil-fired boiler (12.6 million Btu per hour maximum heat input rate)	NA	NA

VI. Emission Source Evaluation

A. Two natural gas/No. 2 fuel oil-fired boilers (9.4 and 12.6 million Btu per hour maximum heat input; ID Nos. BLR-1 and BLR-2, respectively)

These two emission sources are subject to the particulate emission standards described in 15A NCAC 2D .0503, the sulfur dioxide emission standards described in 15A NCAC 2D .0516, and the 40 percent opacity standard of 15A NCAC 2D .0521. In addition, these sources are subject to the state-enforceable odor rule 15A NCAC 2D .1806 and operate under two avoidance conditions for PSD and HAPs (See Sections VII and X of this document for a discussion of these conditions).

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers

Based on the heat input rates of these boilers, the calculated allowable particulate emission rate is 0.489 pounds per million Btu (4.596 and 6.161 pounds per hour, respectively). Per DAQ spreadsheets, the potential particulate emission rates are 0.23 and 0.30 pounds per hour from the combustion of No. 2 fuel oil, respectively. Therefore, continued compliance is expected for both the combustion of No. 2 fuel oil and the much cleaner natural gas.

Per the DAQ shell permit conditions for this rule, no monitoring, recordkeeping, or reporting are required for the combustion of natural gas or No. 2 fuel oil in these sources.

15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources

By rule, the allowable sulfur dioxide emission rate shall not exceed 2.3 pounds per million Btu heat input. This equates to emission rates for these boilers of 21.62 and 28.98 pounds per hour, respectively. Per DAQ spreadsheets, the potential sulfur dioxide emission rates are 20.02 and 26.84 pounds per hour from the combustion of No. 2 fuel oil, respectively. Therefore, continued compliance is expected for both the combustion of No. 2 fuel oil and the much cleaner natural gas.

Per the DAQ shell permit conditions for this rule, no monitoring, recordkeeping, or reporting are required for the combustion of natural gas or No. 2 fuel oil in these sources.

15A NCAC 2D .0521, Control of Visible Emissions

Both boilers pre-date the 1971 cut-off for opacity; therefore, they are required to comply with the 40 percent opacity standard. At the last inspection of the facility, ARO found these two emission sources to be in compliance with the respective visible emission standards. Continued compliance is expected.

Per the DAQ shell permit conditions for this rule, no monitoring, recordkeeping, or reporting are required for the combustion of natural gas or No. 2 fuel oil in these sources.

B. One natural gas-fired dryer (5.0 million Btu per hour maximum heat input rate; ID No. CRM-D-ND) and one natural gas-fired ceramic tunnel kiln (14.0 million Btu per hour maximum heat input rate; ID No. CRM-D-NK)

These two emission sources are subject to the particulate emission standards of 15A NCAC 2D .0515, the sulfur dioxide emission standards of 15A NCAC 2D .0516, and the 20 percent opacity standard of 15A NCAC 2D .0521. In addition, these sources are also subject to the volatile organic compound work practice standards of 15A NCAC 2D .0958, the odor regulation 15A NCAC 2D .1806, and two avoidance conditions for PSD and HAPs (see Sections VII and X for a discussion of these regulations).

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes

The following table displays the calculated allowable particulate emission rates and compliance status for these sources:

Source ID	Process Rate (tph)	2D .0515 Emission Rate (lbs/hr)	Estimated Potential Emission Rate (lbs/hr)*	Compliance Expected
CRM-D-ND	1.008	4.121	2.651	Yes
CRM-D-NK	2.016	6.558	4.062	Yes

* The estimated potential emission rate is based on potential uncontrolled emissions at 8760 hours per year.

The Permittee is required to monitor and maintain the production records which specify the types of materials and finishes processed. Per the DAQ shell permit conditions for this rule, no reporting is required for these sources. Continued compliance is expected.

15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources

Per the ARO review of 01889R14 permit modification:

15A NCAC 2D .0516 limits SO₂ emissions from combustion sources to 2.3 pounds per million Btu. According to the analysis in the March 21, 2001 memorandum by Laura Herbert, Permits Coordinator, natural gas and No. 2 fuel oil are expected to comply with 2D .0516.

*There are also AP-42 Chapter 11.7 emission factors for SO₂ emissions from the ceramic kilns as a result of sulfur in the raw material. The facility reports less than 0.07% sulfur in the raw material. The SO₂ factor is therefore 9.5*0.07 lbs/ton, or 0.665 lbs/ton. Using the new kiln as an example:*

$$\begin{aligned} \text{Lb SO}_2 / \text{million Btu} &= 0.665 \text{ lb SO}_2 / \text{ton} * 2 \text{ tons} / \text{hr} * \text{hr} / 14.0 \text{ million Btu} \\ &= 0.095 \text{ lb SO}_2 / \text{million Btu} - \text{from sulfur in the raw material} \end{aligned}$$

Adding in the SO₂ from the fuel oil contribution for the old kiln would not likely cause the standard to be exceeded.

Therefore, continued compliance is expected.

Per the DAQ shell permit condition for this rule, no monitoring, recordkeeping, or reporting is required for the combustion of natural gas in these sources.

15A NCAC 2D .0521, Control of Visible Emissions

These sources post-date the 1971 cutoff for opacity level; therefore, they are required to comply with the 20 percent limit. Per the latest ARO facility inspection these sources were operating and found to be in compliance with the opacity standard. In addition, it has been noted that there have been no documented exceedances in the standard in the past five years. Continued compliance is expected.

The Permittee is required to monitor visible emissions for these sources on a monthly basis. The results of this monitoring shall be maintained in a logbook and include the date and time of each recorded action, the results of each observation, and the results of any corrective actions performed. Semi-annual reports of all observations are required to be submitted to DAQ on January 30 and July 30 of each year. Continued compliance with 2D .0521 is dependent on the monitoring, recordkeeping, and reporting activities for these sources.

C. Clay/Ceramic Material Handling and Processing equipment including:

- six clay storage silos (ID Nos. CRM-MP-CSS),
- one clay weigh bin (ID No. CRM-MP-CWB),
- one ceramics mixer/conveyor (ID No. CRM-MP-RC1),
- three polishing brush stations (ID No. CRM-GZ-PBS),
- two glaze spray booths (ID Nos. CRM-GZ-GSB-1 and -3),
- one lab glaze spray booth (ID No. CRM-GZ-GSB),
- one ceramics wheelabrator (ID No. CRM-D-W), and

Plastics Department equipment including:

- compression burnishing operation (ID No. CM-CM1)

These emission sources are subject to the particulate standards of 15A NCAC 2D .0515 and the 20 percent opacity standard of 15A NCAC 2D .0521. In addition, these sources are also subject to the odor regulation 15A NCAC 2D .1806 and two avoidance conditions for PSD and HAPs (see Sections VII and X for a discussion of these regulations).

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes

The following table displays the calculated allowable particulate emission rates and compliance status for these sources:

Source ID	Process Rate (tph)	2D .0515 Emission Rate (lbs/hr)	Estimated Potential Emission Rate (lbs/hr)	Compliance Expected
CRM-MP-CSS	16.7	27.039	0.004*	Yes
CRM-MP-CWB	3.3	9.124	0.015*	Yes
CRM-MP-RC1	5.73	13.205	0.005*	Yes
CRM-GZ-PBS	3.496	9.48	5.0	Yes
CRM-GZ-GSB-1 and -3, and CRM-GZ-GSB	2.751	8.077	5.95*	Yes
CRM-D-W	2.16	6.868	0.054*	Yes
CRM-CM1	0.55	2.75	0.015*	Yes

* Note. The potential emissions noted here are after control (where applicable).

The Permittee shall be required to monitor and maintain production records which specify the types of materials and finishes processed in the three polishing brush stations (**ID No. CRM-GZ-PBS**). Because these sources are not controlled, there is no reporting requirement.

Inspection and maintenance shall be required for all control equipment associated with these sources (**ID Nos. CRM-MP-CSS, CRM-MP-CWB, CRM-MP-RC1, CRM-GZ-GSB-1 and -2, CRM-GZ-GSB, CRM-D-W, and CRM-CM1**) consisting of a monthly visual inspection of all ductwork and material collection units, an annual internal inspection of the control device structural integrity, and weekly inspections of the knockdown chain systems. The results of all inspections shall be kept in a logbook. In addition, results shall be submitted semi-annually on January 30 and July 30. Continued compliance is determined based on these monitoring, recordkeeping, and reporting requirements.

15A NCAC 2D .0521, Control of Visible Emissions

These sources all post-date the 1971 cutoff for opacity limits; therefore, they are subject to the 20 percent opacity limit. At the time of the last inspection, ARO commented that all equipment was in compliance with this limit. However, excessive dusting was observed from the ceramics conveyor/mixer (CRM-MP-RC1) and a Notice of Violation was written.

To assure compliance for these sources, the Permittee is required to monitor the bagfilters on a weekly basis. The results of this monitoring are required to be maintained in a logbook and summary reports are required to be submitted semi-annually on January 30 and July 30 of each year. Continued compliance is expected.

D. Ceramic presses (ID No. CRM-MP-PRS), thirty-four compression molding presses (ID No. CM-PRS), and fugitive metal parts fabrication operations (ID No. MF-FUG)

These sources are subject to the 20 percent opacity standard of 15A NCAC 2D .0521. In addition, these sources are also subject to the volatile organic compound work practice standards of 15A NCAC 2D .0958, the odor regulation 15A NCAC 2D .1806, and two avoidance conditions for PSD and HAPs (see Sections VII and X for a discussion of these regulations).

15A NCAC 2D .0521, Control of Visible Emissions

These sources are all post-1971 and therefore subject to the 20 percent opacity standard. Per the latest ARO facility inspection these sources were operating and found to be in compliance with the opacity standard. In addition, it has been noted that there have been no documented exceedances in the standard in the past five years. Continued compliance is expected.

Because these sources are not directly vented, no monitoring, recordkeeping, and reporting is required for visible emissions.

VII. Multiple Emission Source Limits

15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds

Section 2.2 A of the DRAFT permit describes facility-wide multiple emission source requirements. Specifically, the facility is required to comply with the volatile organic compound work practice standards of 15A NCAC 2D .0958. This federally enforceable permit condition describes operating practices, monitoring, recordkeeping and reporting requirements for the handling and storage of volatile organic compounds.

The Permittee is required to perform visual inspections once per month of all operations and processes utilizing volatile organic compounds. The results of these inspections shall be maintained in a logbook and summary reports shall be submitted semi-annually on January 30 and July 30 of each year. Continued compliance is expected.

15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

Section 2.2 B of the DRAFT permit states that “The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility’s boundary.”

This permit condition is State-Enforceable only. Continued compliance is expected.

VIII. MACT Applicability and Requirements

The facility is not currently subject to any maximum achievable control technology standards (MACTs). They have chosen to operate under a federally enforceable permit condition limiting total facility-wide hazardous air pollutants to below the major source thresholds. Therefore, there are no MACT applicability issues associated with this permit activity (See Section X.B of this document for further discussion).

IX. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

X. Other Applicable Requirements

A. PSD

Per the permit review of Mr. Brendan Davey for the renewal of permit 01889R14, “The facility has not conducted a specific modification to increase emissions to become a title V facility. Based on the uncertainty of kerosene (VOC) emissions data, the facility has agreed to conservatively calculate their VOC/kerosene emissions based on a true mass balance....A PSD avoidance condition is included to ensure the facility can remain a PSD minor source based on the new method of emissions calculations.”

The PSD avoidance condition mentioned here limits the facility to 245 tons VOC per consecutive 12-month period (See condition 2.2 C). The Permittee is required to calculate VOC emissions per month by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. Recordkeeping and quarterly reporting are also required.

B. North Carolina Air Toxics

The facility has not triggered toxics and has not made a modification increasing air toxics since the regulation was effective. This first time title V permit application does not affect the total air toxics potentials at the facility.

The facility currently operates under a hazardous air pollutants (HAP) avoidance condition (See condition 2.2 D). This permit condition limits total facility-wide HAPs to less than 10 tons per year of each HAP and 25 tons per year of all HAPs combined. The Permittee is required to record and total annually the facility-wide HAP emissions. An annual reporting requirement is also included.

C. 112(g) Case-By-Case Maximum Achievable Control Technology

There are no case-by-case MACT issues associated with this permit activity.

D. NSPS

There are no NSPS issues associated with this permit activity.

XI. General Conditions

The "General Conditions" section of the Title V Operating Permit lists additional applicable rule requirements that the Permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, severability, etc.

XII. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified. Although each insignificant activity is not listed in the Title V permit, a general condition is placed in the Title V permit stating that all insignificant activities shall comply with the applicable requirements. Those sources which qualify for exemption from permitting under regulation 2Q .0503(8) will be attached to the cover letter of the permit.

The following table represents all equipment listed as insignificant/exempt sources.

Emission Source	Date of Application	Source of TAPS?	Source of Title V Pollutants?
Maintenance Carpentry Shop (ID No. I-MNT-WD)	September 10, 2001	Vented Indoors	PM only -Vented Indoors
Wastewater Treatment Evaporator (ID No. I-IWW-E)	September 10, 2001	No	No
Groundwater Remediation Stripping Unit (ID No. I-GWR)	September 10, 2001	No	Yes
Test Room Rectifier Cooling Exhausts (ID No. I-TSTRM-RE)	September 10, 2001	No	No
Miscellaneous Plant-wide Degreasing Units (ID No. I-MSC-DEG)	September 10, 2001	Yes	Yes
Miscellaneous Plant-wide Printing (ID No. I-MSC-PRNT)	September 10, 2001	No	Yes
Miscellaneous Plant-wide Process Combustion (ID No. I-MSC-PC)	September 10, 2001	Yes	Yes
Miscellaneous Plant-wide Soldering Operations (ID No. I-MSC-SLDR)	September 10, 2001	Yes	Yes
Tool Room Fabulene Wash Tank (ID No. I-TR-WSH)	September 10, 2001	No	No
Tool Room Sandblast Unit (ID No. I-TR-SB)	September 10, 2001	No	Yes
Tool Room Welding Area Exhaust (ID No. I-TR-WLD)	September 10, 2001	No	Yes
Tool Room Heat Treating Area Hood (ID No. I-TR-HT)	September 10, 2001	No	Yes
Tool Room Linear Grinders Bagfilter (ID No. I-TR-LG)	September 10, 2001	Vented Indoors	PM only -Vented Indoors
Tool Room EDM Machines (ID No. I-TR-EDM)	September 10, 2001	No	Yes
Warehouse Battery Charging Hood (ID No. I-WH-BC)	September 10, 2001	No	No
Maintenance Shop Welding Area Exhaust (ID No. I-MNT-WLD)	September 10, 2001	No	Yes
Ceramics White Glaze Mixing Station (ID No. I-CRM-Z-WGM)	September 10, 2001	No	Yes
Ceramics Glazing Dynablast Units and Bagfilter (ID No. I-CRM-GZ-DB)	September 10, 2001	Vented Indoors	PM only -Vented Indoors
Ceramics Color Glaze Mixers (ID No. I-CRM-GZ-CGM)	September 10, 2001	No	Yes
Compression Molding Flashoff (ID No. I-CM-FLSH)	September 10, 2001	Vented Indoors	PM only -Vented Indoors
Injection Molding Presses (ID No. I-IM-PRS)	September 10, 2001	No	Yes
Decora Burnishing (ID No. I-DC-B)	September 10, 2001	Vented Indoors	PM only -Vented Indoors
175 kW Diesel Fuel-Fired Emergency Generator (ID No. I-EMG)	September 10, 2001	Yes	Yes
Metal Fabrication Parts Washing/Liquid Burnishing (ID No. I-MF-WSH)	September 10, 2001	No	Yes
Miscellaneous Plant-wide Organic Liquid Storage (ID No. I-MSC-OST)	September 10, 2001	Yes	Yes
Miscellaneous Plant-wide Inorganic Liquid Storage (ID No. I-MSC-IOST)	September 10, 2001	No	No
Miscellaneous Plant-wide Small Sandblast Units (ID No. I-MSC-SB)	September 10, 2001	Vented Indoors	PM only -Vented Indoors

XIII. Public Notice

Pursuant to 15A NCAC 2Q. 0521, a notice of the draft Title V Operating Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA.

XIV. Recommendations

The facility's first time Title V application has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The DAQ has made a preliminary determination that the facility is complying or will achieve compliance as specified in the DRAFT permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.

Review of Comments on DRAFT permit:

Equipment List

1. ARO requests that the equipment list keep the facility equipment headings established in the latest version. Agree; the headings will be re-inserted.
2. ARO requests that the control device descriptions include types established in the latest version. Agree; the types will be re-inserted.
3. ARO noted a type in the equipment description of source CRM-MP-RC1 in the equipment table. Agree; correction will be made.
4. ARO comments that insignificant activities table should clearly identify which equipment is new to this permit from the equipment that was already listed in the latest version. Agree; a re-check of the list confirms that all listed equipment is correct.

Visible Emissions Monitoring

1. Leviton and ARO recommend that NO monitoring be required for the boilers because they combust natural gas and No. 2 fuel oil exclusively. Agree; change will be made.
2. Leviton and ARO recommend that NO monitoring be required for the ceramic presses, metal parts fugitives, and compression molding because they are not directly vented. Agree; change will be made.
3. ARO recommends that the monitoring for the bagfilters and glaze booths be listed as weekly and not monthly because the facility was already doing this level due to past visible emission problems. Agree; change will be made.
4. Leviton and ARO recommend that the monitoring for the fuel-fired kilns and dryers be listed as monthly and not daily because no visible emissions are currently expected with the use of kerosene instead of mold oil. Agree; change will be made.

Inspection and Maintenance

1. ARO comments that the weekly inspection requirement for the knockdown chains had been omitted from the DRAFT permit (where it is required in the latest version). Agree; requirement will be re-inserted.

Removal of Equipment from Permit

1. Leviton comments that Glaze Booth #2 (ID No. CRM-GZ-GSB-2) should be removed from the permit because it will no longer be in service after July 31, 2003. The production rates should also be reduced by one third for calculation purposes. Agree; source and associated control device will be removed from permit.
2. Leviton comments that the old kiln (ID No. CRM-D-OK), old dryer (ID No. CRM-D-OD), and preheater tunnel (ID No. CRM-D-PHT) should be removed from the permit due to the fact that they have been shut down and should physically be removed from the facility by the end of the year. Agree; sources will be removed from permit.