

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/19/2013

Certified Mail

Mr. Thomas Bauer
The Garland Company, Inc.
3800 E. 91st St.
Cleveland, OH 44105

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318007412
Permit Number: P0115867
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
The Garland Company, Inc.**

Facility ID:	1318007412
Permit Number:	P0115867
Permit Type:	Administrative Modification
Issued:	12/19/2013
Effective:	12/19/2013
Expiration:	11/26/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
The Garland Company, Inc.

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. P002, Membrane Line No. 1	11



Final Permit-to-Install and Operate
The Garland Company, Inc.
Permit Number: P0115867
Facility ID: 1318007412
Effective Date: 12/19/2013

Authorization

Facility ID: 1318007412
Application Number(s): A0048941
Permit Number: P0115867
Permit Description: Administrative modification to PTIO P0107340, for emissions unit P002 Saturator Line to allow processing of new coal tar blend material. Processing of new material will result in higher levels of particulate emissions, however control equipment (filter baghouse) will be installed to control PE from new material so that emissions will remain below currently permitted/allowable emissions rates. There will be no increase in the allowable hourly or annual emissions limitations.
Permit Type: Administrative Modification
Permit Fee: \$500.00
Issue Date: 12/19/2013
Effective Date: 12/19/2013
Expiration Date: 11/26/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

The Garland Company, Inc.
3800 EAST 91ST STREET
Cleveland, OH 44105

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

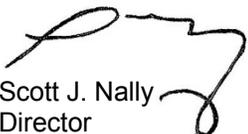
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install and Operate
The Garland Company, Inc.
Permit Number: P0115867
Facility ID: 1318007412
Effective Date: 12/19/2013

Authorization (continued)

Permit Number: P0115867

Permit Description: Administrative modification to PTIO P0107340, for emissions unit P002 Saturator Line to allow processing of new coal tar blend material. Processing of new material will result in higher levels of particulate emissions, however control equipment (filter baghouse) will be installed to control PE from new material so that emissions will remain below currently permitted/allowable emissions rates. There will be no increase in the allowable hourly or annual emissions limitations.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P002
Company Equipment ID:	P002
Superseded Permit Number:	P0107340
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
The Garland Company, Inc.
Permit Number: P0115867
Facility ID: 1318007412
Effective Date: 12/19/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
The Garland Company, Inc.
Permit Number: P0115867
Facility ID: 1318007412
Effective Date: 12/19/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

The Garland Company, Inc.

Permit Number: P0115867

Facility ID: 1318007412

Effective Date: 12/19/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
The Garland Company, Inc.
Permit Number: P0115867
Facility ID: 1318007412
Effective Date: 12/19/2013

C. Emissions Unit Terms and Conditions



1. P002, Membrane Line No. 1

Operations, Property and/or Equipment Description:

Membrane Line No. 1 for production of smooth- and mineral-faced asphalt roll roofing; consists of let-off accumulator, saturator, coater, finished goods accumulator, winder, palletizer, (2) asphalt mixers, rubber/filler blend station, (2) rubber/filler applicator hoppers and mineral applicator hoppers (with recycling units), and equipped with baghouse.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3)-(6) and e)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Established by PTI 13-04047, 7/10/2003)	Particulate Emissions (PE) shall not exceed 1.07 lbs/hr and 4.7 tons per year (TPY). Volatile Organic Compound (VOC) emissions shall not exceed 3.5 lbs/hr and 15.3 TPY. The requirements of this rule include compliance with 40 CFR Part 60, Subpart UU.
b.	OAC rule 3745-17-07(A)(1)	The requirements of this rule are equivalent to the requirements of 40 CFR Part 60, Subpart UU.
c.	OAC rule 3745-17-07(B)	The requirements of this rule are less stringent than the requirements pursuant to 40 CFR Part 60, Subpart UU.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11	The requirements of this rule are less stringent than the requirements pursuant to 40 CFR Part 60, Subpart UU.
f.	40 CFR Part 60, Subpart UU	See b)(2)c. ,b)(2)d. and d)(9) below.
g.	ORC rule 3704.03(F)(4)(c)	See d)(3) through d)(6) and e)(3) below.

(2) Additional Terms and Conditions

- a. Fugitive emissions from mineral handling are controlled by minimizing the height of the bags and super sacks (containing raw materials) over the hoppers when transferring material.
- b. The permittee shall submit a new application and be issued a new permit if a new process material is to be used that would cause the emissions unit to exceed the permitted potential to emit established in this permit.
- c. The permittee shall comply with the particulate emissions limitation required under the following Section of 40 CFR Part 60, Subpart UU:

60.472(a)(1)(i)	0.04 kg/Mg (0.08 lb/ton) of mineral-surfaced roll roofing produced
60.472(a)(1)(ii)	0.04 kg/Mg (0.08 lb/ton) of smooth-surfaced roll roofing produced

- d. The permittee shall comply with the opacity limitations required under the following Section of 40 CFR Part 60, Subpart UU:

60.472(a)(2)	Visible emissions from the saturator shall not exceed 20 percent opacity
60.472(a)(3)	visible emissions from the saturator capture system shall not exceed 20 percent opacity for any period of consecutive valid observations totaling 60 minutes
60.472(d)	emissions from mineral handling shall not exceed 1 percent opacity

- e. The emissions from this emissions unit shall be vented to the baghouse at all times when processing any material containing coal tar pitch.



c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions when processing any materials containing coal tar pitch and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records, in tons per hour, of the mineral-surfaced roll roofing products, smooth-surfaced roll roofing products, and coal tar pitch containing products produced in this emissions unit.
- (2) 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(s) and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (3) The permit-to-install and operate (PTIO) application for this emissions unit, P002, was evaluated based on the actual materials and the design parameters of the emissions



unit's(s) exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values or Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$
- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Stoddard Solvent

TLV (mg/m³): 572.60

Maximum Hourly Emission Rate (lbs/hr): 3.5

Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 181

MAGLC (µg/m³): 13633.26



The permittee, has demonstrated that emissions of Stoddard Solvent, from emissions unit(s) P002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), "that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);



Final Permit-to-Install and Operate

The Garland Company, Inc.

Permit Number: P0115867

Facility ID: 1318007412

Effective Date: 12/19/2013

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (7) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
- (8) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. Whenever the baghouse is in operation to control coal tar pitch containing product emissions, the permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (9) The permittee shall comply with the monitoring of operations as required under the following section of 40 CFR Part 60, Subpart UU:

60.473(a)	Continuously monitor and record the temperature of the gas at the inlet of the control device.
-----------	--

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(2).
 - a. all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit;
 - b. all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive particulate emissions.
 - (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration, in the Annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (4) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in d)(8) where a prompt investigation was not conducted;
 - d. each incident of deviation described in d)(8) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in d)(8) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

Particulate Emissions shall not exceed 1.07 lbs/hr and 4.7 TPY

Applicable Compliance Method:

The hourly emission rate was calculated based upon the following calculation:

$$(0.08 \text{ lb PM/ton roofing}) * (\text{production rate tons roofing/hr}) = \text{lbs PM/hr}$$

Where:

0.08 lb PM/ton roofing = NSPS limits for mineral-surfaced roofing and smooth surfaced roofing; and

The production rate (ton/hr) shall be determined by d)(1).

Compliance with the annual emission limitation shall be assumed provided compliance is maintained with the short term emission limitation.

b. Emission Limitation:

VOC emissions shall not exceed 3.5 lbs/hr and 15.3 TPY.

Applicable Compliance Method:

Compliance will be based upon the following calculation:

$$(0.26 \text{ lb VOC/ton roofing}) * (\text{maximum production ton/hr}) = \text{lbs VOC/hr}$$

Where:

0.26 lb VOC/ton roofing = the emission factor from "Compilation of Air Pollutant Emission Factors," AP-42, Fifth Edition (01/95), Table 11.2-4; and

The production rate (ton/hr) shall be determined by d)(1).

Compliance with the annual emission limitation shall be assumed provided compliance is maintained with the short term emission limitation.

c. Emission Limitation:

60.472(a)(2)	less than 20% opacity for exhaust gases
--------------	---

Applicable Compliance Method:

Compliance shall be determined using U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

60.472(a)(3)	Visible emissions from the saturator capture system(s) shall not exceed more than 20% of any period of consecutive valid observations totaling 60 minutes.
--------------	--



Applicable Compliance Method:

60.474(d)	Method 22, modified so that the readings are recorded every 15 seconds for a period of consecutive observations totaling 60 minutes
-----------	---

e. Emission Limitation:

60.472(d)	less than 1% opacity for mineral handling emissions
-----------	---

Applicable Compliance Method:

Compliance shall be determined using U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

f. Emission Limitations:

60.472(a)(1)(i)	0.04 kg/Mg (0.08 lb/ton) of mineral-surfaced roll roofing produced
60.472(a)(1)(ii)	0.04 kg/Mg (0.08 lb/ton) of smooth-surfaced roll roofing produced

Applicable Compliance Method:

Compliance shall be demonstrated using the test methods and procedures outlined in 40 CFR Part 60, Subpart UU:

60.474(a)(1)	tests shall be conducted while 106.6 kg (235 lb) shingle is being produced
60.474(a)(2)	tests shall be conducted while 6.8 kg (15 lb) felt is being produced
60.474(b)	test methods and procedures
60.474(c)	equation for calculating the emission rate of particulate matter for each run

- (2) The permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of particulates in the exhaust stream
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):



For Particulate Emissions, Method 5A of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
 - f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.
- g) **Miscellaneous Requirements**
- (1) The permittee has requested a modification to PTIO P0107340, for emissions unit P002 (saturator line) to process new coal tar pitch blend material. The new material will generate higher levels of particulate emissions than currently utilized process materials. Control equipment (filter baghouse) will be installed to control PE while processing coal tar pitch containing material. The permittee has requested that permit emissions limitations remain the same. Additionally, the permittee has requested an operational restriction (see c)(1)) above to only utilize the control equipment when processing coal tar pitch containing material.
 - (2) Emission testing was conducted 2/23/2010 through 2/24/2010 to satisfy requirement of testing within 3 months of permit issuance as specified in f)(2)a. above. An average emissions rate of 0.22 lb PM/hr (uncontrolled) was determined.