



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
WARREN COUNTY  
Application No: 14-05782  
Fac ID: 1483040007**

**CERTIFIED MAIL**

**DATE: 12/7/2006**

IKO Production Inc.  
David Foulkes  
1200 S. Main St.  
Franklin, OH 450050000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

HCDES

Ohio KY-IN Reg Coun of Gov

KY IN

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install: 14-05782

A. Source Description:

IKO produces asphalt-coated fiberglass roofing shingles through a series of processes including material handling, asphalt blowing, and shingle production. Emission unit (EU) P002 is the asphalt-coated shingle production line. This air permit-to-install (PTI) is to limit the particulate emissions (PE)/particulate matter less than 10 microns in diameter (PM10) emissions to less than 100 tons per year (TPY), thus avoiding Title V permitting requirements.

B. Facility Emissions and Attainment Status:

Prior to this synthetic minor air PTI for emission unit (EU) P002, the facility potential to emit (PTE) particulate emissions (PE), excluding any material handling emissions units, is:

EU P002	59.01 TPY	based on Fig. II at 41 TPH and 8760 hour per year;
EU P004	42.28 TPY	based on draft/final air PTI number 14-02265 issued 09/05/91 and not issued as a synthetic minor; and
EU P005	2.71 TPY	based on draft/final air PTI number 14-04386 issued 12/17/97 as a synthetic minor.
Total	104.0 TPY	

After this synthetic minor air PTI for EU P002, and a permit modification to EU P004 to account for an emission factor change, the facility PTE is:

EU P002	49.55 TPY	based on draft/final air PTI number 14-05782 administrative modification to be issued as a synthetic minor;
EU P004	38.48 TPY	based on pending federally enforceable state operating permit (FESOP) renewal accounting for emissions factor change and issued as a synthetic minor; and
EU P005	2.71 TPY	based on draft/final air PTI number 14-04386 issued 12/17/97 as a synthetic minor.
Total	90.74 TPY	

Warren County is non-attainment for ozone.

C. Source Emissions:

49.55 TPY based on draft/final air PTI number 14-05782 administrative modification.

D. Conclusion:

Since the air PTI administrative modification limits the EU's potential to emit particulate emissions to 49.55 TPY based on a rolling, 12-month summation and will, in effect, limit the facility PTE of PE to less than the major source threshold, the facility will avoid the Part 70 Title V requirements.



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-05782**

Application Number: 14-05782  
Facility ID: 1483040007  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: IKO Production Inc.  
Person to Contact: David Foulkes  
Address: 1200 S. Main St.  
Franklin, OH 450050000

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1200 S. Main St.  
Franklin, Ohio**

Description of proposed emissions unit(s):  
**Administrative Modification to PTI 14-05782 issued as a Direct Final on 5/18/2006 in order to have the PTI designated as a Synthetic Minor PTI and issued in Draft/Final format.**

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

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements**

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.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### **5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

#### **6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### **7. 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.

#### **8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

**IKO Production Inc.**

**Facility ID: 1483040007**

**PTI Application: 14-05782**

**Issued: To be entered upon final issuance**

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. 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.

**13. Source Operation and Operating Permit Requirements 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. 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>
<u>PE/PM10</u>	<u>49.55</u>
<u>OC</u>	<u>45.96</u>
<u>CO</u>	<u>0.25</u>

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 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.

**Operations, Property, and/or Equipment - (P002) - 41 TPH asphalt shingle main production line with Monsanto fabric filter, CVM fabric filters and Flex Kleen fabric filters; mixer, coater, heater, cooling section, cutter, laminator, wrapper - Modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the Monsanto unit stack shall not exceed 2.2 pounds per hour.</p> <p>Fugitive particulate emissions (PE) shall not exceed 13.1 pounds per hour.</p> <p>Particulate matter 10 microns and less in diameter (PM10) emissions from the Monsanto unit stack shall not exceed 2.2 pounds per hour.</p> <p>Fugitive particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 13.1 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.08 pound per hour.</p> <p>Organic Compound (OC) emissions from the Monsanto unit stack shall not exceed 13.1 pounds per hour.</p> <p>Fugitive organic compound (OC) emissions shall not exceed 1.1 pounds per hour.</p> <p>Visible fugitive emissions shall not exceed 20 percent opacity as a three-minute average.</p> <p>See term and condition B.1 and B.2.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-17-07(A)(1) and 40 CFR Part 60, Subpart UU.</p>



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Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

**B. Operational Restrictions**

1. The maximum annual asphalt coated shingle production rate for this emissions unit shall not exceed 265,680 tons per year, based upon a rolling, 12-month summation of the asphalt coated shingle production rates. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.
2. The pressure drop across the Monsanto mist eliminator/filter shall be maintained within the range of 3 to 20 inches of water, as recommended (in writing) by the manufacturer of the Monsanto unit or by a range, as yet to be established during an emissions test, that demonstrates the emissions unit to be in compliance.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the asphalt coated shingle production rate, in tons, for each month;
  - b. the rolling, 12-month summation of the asphalt coated shingle production rates, in tons;
  - c. the updated rolling, 12-month summation of the actual PE/PM10, OC and CO emissions, from the emissions unit, in tons, for each month. This shall include the information for the current month and the preceding eleven months:
    - i. [the actual asphalt coated shingle production rate from C.1.b (tons of asphalt coated shingles/rolling, 12-month period) x controlled stack emission factor (lbs of PE/PM10/ton of asphalt coated shingles produced) x 1 ton/2000 lbs] + [the actual asphalt coated shingle production rate from C.1.b (tons of asphalt coated shingles/rolling, 12-month period) x uncontrolled emission factor (lbs of PE/PM10/ton of asphalt coated shingles produced) x (1 - capture efficiency/100) x 1 Ton/2000 lbs] = tons of PE/PM10 per rolling, 12-month period;
    - ii. [the actual asphalt coated shingle production rate from C.1.b (tons of asphalt coated shingles/rolling, 12-month period) x stack emission factor

Emissions Unit ID: **P002**

(lbs of OC/ton of asphalt coated shingles produced) x 1 Ton/2000 lbs] + [the actual asphalt coated shingle production rate from C.1.b (tons of asphalt coated shingles/rolling, 12-month period) x uncontrolled emission factor (lbs of OC/ton of asphalt coated shingles produced) x (1 - capture efficiency/100) x 1 Ton/2000 lbs] = Tons of OC per rolling, 12-month period; and

- iii. [the actual asphalt coated shingle production rate from C.1.b (tons of asphalt coated shingles/rolling, 12-month period) x emission factor (lbs of CO/ton asphalt coated shingles produced) x 1 Ton/2000 lbs] = tons of CO per rolling, 12-month period.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the Monsanto mist eliminator/filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the Monsanto mist eliminator/filter on a daily basis.
  3. The permittee shall perform weekly checks, when the emissions unit is in operation, and when the weather conditions allow, for any visible emissions of fugitive PE from the building and/or visible emissions from the Monsanto unit 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 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 emissions incident; and
    - e. any corrective actions taken to eliminate the visible emissions.

#### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month asphalt coated shingle production limitation specified in term and condition B.1. The reports shall be submitted to Hamilton County Department of Environmental Services by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.) If no exceedances occurred, the permittee shall state so in the report.
2. The permittee shall notify the Hamilton County Department of Environmental Services of all periods of time during which the pressure drop across the Monsanto mist

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eliminator/filter did not comply with the allowable range specified in term and condition B.2. The reports shall be submitted to Hamilton County Department of Environmental Services by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.) If no exceedances occurred, the permittee shall state so in the report.

3. The permittee shall submit semi-annual reports that (a) identify all weeks during which any visible emissions were observed from the Monsanto unit stack serving this emissions unit or any visible emissions of fugitive dust from the building were observed and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period and shall include copies of all Method 9 readings that were performed, if any.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the rolling, 12-month PE, PM10, CO or OC emission limitations set forth in term and condition A.1. The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.) If no exceedances occurred, the permittee shall state so in the report.
5. The permittee shall submit annual reports that specify the total PE, PM10, and OC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. The Synthetic Minor Fee Emission Report (FER) required to be submitted annually by April 15 for the facility will also satisfy the emission reporting requirement of this condition.
6. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Hamilton County Department of Environmental Services  
250 William Howard Taft Road  
Cincinnati, Ohio 45219

## E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:

Particulate emissions (PE) from the Monsanto Unit stack shall not exceed 2.2 pounds per hour; and  
Organic Compound (OC) emissions from the Monsanto Unit stack shall not exceed 13.1 pounds per hour.

Applicable Compliance Methods:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. the emission testing shall be conducted within 3 months after issuance of this permit;
- ii. the emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate limitations for particulates and OCs;
- iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
  - a. for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and
  - b. for OCs, Methods 1-4 and 25 of 40 CFR Part 60, Appendix A

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

- iv. 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 appropriate Ohio EPA District Office or local air agency;
- v. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the

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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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

- vi. personnel from the appropriate Ohio EPA District Office or local air agency 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; and
- vii. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

Emission Limitations:

Fugitive particulate emissions (PE) shall not exceed 13.1 pounds per hour;  
Fugitive particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 13.1 pounds per hour;  
Organic compound (OC) emissions shall not exceed 1.1 pounds per hour; and  
Carbon monoxide (CO) emissions shall not exceed 0.08 pound per hour.

Applicable Compliance Methods:

Compliance shall be demonstrated through emission calculations and based on the maximum asphalt shingle production throughput based on data provided in the air permit to install application number 14-05782 submitted on November 3, 2005.

PE emission factor = 3.2 lbs of PE/PM10/ton of asphalt shingles produced (AP-42, 11.2, 1/95);  
OC emission factor = 0.26 lb of OC/ton of asphalt shingles produced (AP-42, 11.2, 1/95);  
CO emission factor = 0.0019 lb of CO/ton of asphalt shingles produced (AP-42, 11.2, 1/95);  
Estimated Monsanto Unit capture efficiency = 90%;  
Asphalt shingle production rate = 41 tons of asphalt shingles produced /hr which is the

Emissions Unit ID: P002

maximum production rate of this emissions unit;

41 tons of asphalt shingle produced/hour x 3.2 lbs of PE/PM10/ton of asphalt shingle produced x (1-0.90) = 13.1 pounds per hour of PE/PM10. PM10 is assumed to be equal to PE;

41 tons of asphalt shingles produced/hour x 0.26 lb of OC/ton of asphalt shingles produced x (1-0.90) = 1.1 pounds per hour of OC; and

41 tons of asphalt shingles produced/hour x 0.0019 lb of CO/ton asphalt shingle = 0.08 pound per hour of CO.

Emissions Limitation:

Visible fugitive of PE shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, as such appendix existed on July 1, 2002, and the procedures specified in OAC rule 3745-17-03(B)(3).

Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Emissions Limitations:

Particulate emissions (PE) shall not exceed 49.55 TPY including stack emissions and fugitive (uncontrolled) emissions;

Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 49.55 TPY including stack emissions and fugitive (uncontrolled) emissions;

Carbon monoxide (CO) emissions shall not exceed 0.25 TPY; and

Organic Compound (OC) emissions shall not exceed 45.96 TPY including stack and fugitive (uncontrolled) emissions.

Applicable Compliance Methods:

Compliance shall be determined by the record keeping requirements in term and

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condition C.1.c. Additionally, the emission factors may be either based on factors to be developed (TBD) from the most recent compliance test(s) demonstrating compliance with the applicable short-term emission limitations, in the case of PE and OC emissions, or based on AP-42 emission factors, in the case of PE, OC and/or CO emissions.

Controlled PE emission factor = TBD or 0.053 lb of PE/PM10/ton of asphalt shingles produced (AP-42, 11.2, 1/95);

Uncontrolled PE emission factor = 3.2 lbs of PE/PM10/ton of asphalt shingles produced (AP-42, 11.2, 1/95);

Controlled OC emission factor = TBD or 0.32 lb of OC/ton of asphalt shingles produced (AP-42, Chapter 11.2, 1/95);

Uncontrolled OC emission factor = 0.26 lb of OC/ton asphalt shingles produced (AP-42, Chapter 11.2, 1/95);

CO emission factor = 0.0019 lb of CO/ton of asphalt shingles produced (AP-42, Chapter 11.2, 1/95); and,

Estimated Monsanto Unit capture efficiency = 90%.

2. Compliance with the production limitation in term and condition B.1 shall be demonstrated by the record keeping requirements in term and condition C.1.
3. Compliance with the pressure drop limitation in term and condition B.2 shall be demonstrated by the record keeping requirements in term and condition C.2.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this air permit-to-install shall be federally enforceable: A, B, C, D, and E.
2. The terms and conditions of this air permit-to-install shall supersede the terms and conditions of air permit to install number 14-05782 issued on May 18, 2006.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05782 Facility ID: 1483040007

FACILITY NAME IKO Production Inc.

FACILITY DESCRIPTION Administrative Modification to PTI 14-05782 issued as a Direct Final on 5/18/2006 in order to have the PTI designated as a Synthetic Minor PTI and issued in Draft/Final format. CITY/TWP Franklin

SIC CODE 2952 SCC CODE 3-05-001-19 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION 41 TPH asphalt shingle main production line with Monsanto fabric filter, CVM fabric filters and Flex Kleen fabric filters; mixer, coater, heater, cooling section, cutter, laminator, wrapper

DATE INSTALLED 1992

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			2.2 lbs/hr, controlled; 13.1 lbs/hr uncontrolled	49.55, controlled + uncontrolled
PM <sub>10</sub>	Attainment			2.2 lbs/hr, controlled; 13.1 lbs/hr uncontrolled	49.55, controlled + uncontrolled
Sulfur Dioxide					
Organic Compounds	Primary non-attainment			13.1 lbs/hr controlled; 1.1 lb/hr uncontrolled	45.96, controlled + uncontrolled
Nitrogen Oxides					
Carbon Monoxide	Attainment			0.08 lb/hr	0.25
Lead					
Other: Air Toxics					

## APPLICABLE FEDERAL RULES:

NSPS? Subpart UU      NESHAP?      PSD?      OFFSET POLICY?

## WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of fabric filters and mist eliminators, compliance with the rolling, 12-month asphalt coated shingle production rate limitation, and compliance with the visible emissions limitations and the PE/PM<sub>10</sub>, CO, and OC emissions limitations.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

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**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?

\_\_\_\_\_ YES      x   NO

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05782 Facility ID: 1483040007

FACILITY NAME IKO Production Inc.

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FACILITY DESCRIPTION	Administrative Modification to PTI 14-05782 issued as a Direct Final on 5/18/2006 in order to have the PTI designated as a Synthetic Minor PTI and issued in Draft/Final format.	CITY/TWP	Franklin
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IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_