Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

Certified Mail

7/18/2016

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

Barry Lee
SOPREMA INC
310 QUADRAL DR
WADSWORTH, OH 44281

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652100083
Permit Number: P0121194
Permit Type: Administrative Modification
County: Medina

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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: ARAQMD

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
SOPREMA INC

Facility ID:	1652100083
Permit Number:	P0121194
Permit Type:	Administrative Modification
Issued:	7/18/2016
Effective:	7/18/2016
Expiration:	8/18/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
SOPREMA INC

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Authorization

Facility ID: 1652100083
Application Number(s): M0004081
Permit Number: P0121194
Permit Description: Agency-initiated Administrative Modification of P0117339 to identify the acceptable range for the pressure drop across the scrubber and update daily monitoring to record pressure drop in units of millibar instead of psig.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 7/18/2016
Effective Date: 7/18/2016
Expiration Date: 8/18/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SOPREMA INC
310 QUADRAL DR
Wadsworth, OH 44281

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0121194
Permit Description: Agency-initiated Administrative Modification of P0117339 to identify the acceptable range for the pressure drop across the scrubber and update daily monitoring to record pressure drop in units of millibar instead of psig.

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

Emissions Unit ID:	**P901**
Company Equipment ID:	Roofing Products Line
Superseded Permit Number:	P0117339
General Permit Category and Type:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. P901, Roofing Products Line

Operations, Property and/or Equipment Description:

Roofing Products Line - saturator, sand applicator and five mixers.

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. None.

(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)	Particulate emissions (PE) from the wet scrubber that controls emissions units P001 and P901 shall not exceed 3.85 pounds per hour (lb/hr) and 0.030 grain per dry standard cubic foot (gr/dscf) of exhaust gases. Total PE from P001 and P901 shall not exceed 16.9 tons per year (tpy). Organic compound (OC) emissions from the wet scrubber that controls emissions units P001 and P901 shall not exceed 3.8 lb/hr and 16.6 tpy. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[Medina County is an area identified in Appendix A of OAC rule 3745-17-08.]	exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3) [Medina County is an area identified in Appendix A of OAC rule 3745-17-08.]	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	See b)(2)c. below.
f.	40 CFR Part 60, Subpart UU (40 CFR 60.470 – 60.474) [In accordance with 40 CFR 60.470(a) and (b) emissions unit P901 has a saturator constructed after November 18, 1980 at an asphalt roofing plant and is subject to the requirements specified by this section.]	No permittee shall cause to be discharged into the atmosphere from any saturator: Particulate matter in excess of: 0.04 kilogram per megagram (kg/Mg) or 0.08 pound per ton (lb/ton) of asphalt shingle or mineral-surfaced roll roofing produced; 0.4 kg/Mg or 0.8 lb/ton of saturated felt or smooth-surfaced roll roofing produced; Exhaust gases with opacity greater than 20%; and Any visible emissions from a saturator capture system for more than 20% of any period of consecutive valid observations totaling 60 minutes. [40 CFR 60.472(a)]

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07 and 40 CFR Part 60, Subpart UU.

b. The hourly and annual PE and OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping or reporting requirements are necessary to demonstrate compliance with these emission limitations.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials processed, change in the method of operation, or any other change of the emissions unit in this permit that results in an increase in the allowable emissions or results in an increase in

emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

c. The emission limitations and control requirements specified by these rules are equivalent to or less stringent than the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(A)(3) and/or 40 CFR Part 60, Subpart UU.

c) Operational Restrictions

(1) The emissions from the sand applicators, asphalt mixers and the saturator line shall be vented to the wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document all dates/times when the wet scrubber serving this emissions unit was not in service when the emissions unit was in operation.

(2) The permittee shall perform a visual and odor (smell) check of the wet scrubber system on a daily basis, while the emissions unit is in operation, to determine whether or not the wet scrubber is operating properly. For the purposes of this permit, the wet scrubber is operating properly when it has adequate water level, water recirculation and water purity to perform as specified in the application; maintains compliance with the applicable PE limitations; and reduces odorous emissions so as not to cause a public nuisance, per the definition of OAC rule 3745-15-07(A). Adequate water level, water recirculation and water purity in the wet scrubber is demonstrated by the permittee's daily wet scrubber visual/odor checks and engineering judgment, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. For this requirement, proper operation is defined as the emissions unit and the wet scrubber operating per the manufacturer's design and absent of any unordinary visible emissions and/or odors.

Whenever the permittee determines the wet scrubber system is not operating properly, the permittee shall promptly investigate and correct the cause, if known, and shall maintain records of the following information for each investigation, including any corrective actions taken:

a. the date and time the improper operation began;

b. the date the investigation was conducted;

c. the name(s) of the personnel who conducted the investigation;

d. the findings and recommendations.

e. a description of the corrective action;

f. the date the corrective action was completed;

g. the date and time the improper operation ended; and

h. the name(s) of the personnel who performed the corrective action.

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.

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit,the acceptable range or limit for the pressure drop across the scrubber shall be 10.01 millibars (0.15 psi) to 50.00 millibars (0.73 psi), based upon the engineering specifications.

(4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber, in millibars (mbar), during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber 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 range or limit for the pressure drop across the scrubber shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

Whenever the monitored value deviates from the range or minimum limit 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 control equipment parameter within the acceptable range, or at or above the minimum limit 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 the 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 reading 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.

(5) The range and/or limit for the pressure drop 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 range or limit for the pressure drop based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. 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.

(6) 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 and for any visible emissions of fugitive dust 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or local air agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual PER the following information concerning the operations and performance of the wet scrubber during the 12-month reporting period for this emissions unit:

a. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the wet scrubber, or when the wet scrubber was not in operation when the emissions unit was in operation, as well as the reason(s) the wet scrubber was not employed, based on the information recorded in d)(1) above;

b. each period of time (start time and date, and end time and date) when the wet scrubber system was not operating properly, based on the information recorded in d)(2) above;

c. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

d. each incident described in “a”, “b” or “c” (above) where a prompt investigation was not conducted;

e. each incident described in “a”, “b” or “c” (above) where prompt corrective action was determined to be necessary and was not taken; and

f. each incident described in “a”, “b” or “c” (above) 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.

(4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(6) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. all days during which any visible emissions of fugitive dust 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 from the stack and/or visible emissions of fugitive dust.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitations:

PE from the wet scrubber stack shall not exceed 3.85 lb/hr and 0.030 gr/dscf.

Applicable Compliance Method:

If required, compliance with the allowable PE limitations above shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 or 5A, as applicable and the procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Total PE from emissions units P001 and P901 shall not exceed 16.9 tpy.

Applicable Compliance Method:

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the combined allowable particulate emissions rate of 3.85 pounds

per hour scrubber stack by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the combined hourly limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

e. Emission Limitations:

OC emissions shall not exceed 3.8 lb/hr and 16.6 tpy.

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the OC emission factor of 3.8 lb/hr by the number of hours the unit operated. The hourly OC emission rate was determined by emission test conducted July 16, 2015.

Compliance with the annual allowable OC emission limitation above shall be demonstrated by multiplying the hourly allowable OC emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be demonstrated.

f. Emission Limitations:

No permittee shall cause to be discharged into the atmosphere from any saturator:

Particulate matter in excess of:

0.04 kg/Mg (0.08 lb/ton) of asphalt shingle or mineral-surfaced roll roofing produced; or

0.4 kg/Mg (0.8 lb/ton) of saturated felt or smooth-surfaced roll roofing produced.

Applicable Compliance Method:

Compliance with the allowable particulate matter emission limitations above shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5A and the procedures specified in 40 CFR 60.474(c), and as specified in f)(2) below.

g. Emission Limitation:

No permittee shall cause to be discharged into the atmosphere from any saturator exhaust gases with opacity greater than 20%.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR 60.11.

h. Emission Limitation:

No permittee shall cause to be discharged into the atmosphere from any saturator any visible emissions from a saturator capture system for more than 20% of any period of consecutive valid observations totaling 60 minutes.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A, modified so the readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8(c)) totaling 60 minutes (a performance test shall consist of one run).

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

a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate matter as specified in 40 CFR Part 60, Subpart UU. Note: the permittee demonstrated compliance with Subpart UU with a stack test conducted on July 10, 2010.

b. The following test method(s) and procedures shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter as specified in 40 CFR Part 60, Subpart UU:

i. For saturators, the permittee shall conduct performance tests required in §60.8 of 40 CFR Part 60, Subpart A as follows:

(a) If the final product is shingle or mineral-surfaced roll roofing, the tests shall be conducted while 106.6-kg (235-lb) shingle is being produced.

(b) If the final product is saturated felt or smooth-surfaced roll roofing, the tests shall be conducted while 6.8-kg (15-lb) felt is being produced.

(c) If the final product is fiberglass shingle, the test shall be conducted while a nominal 100-kg (220-lb) shingle is being produced.

ii. In conducting the performance tests required in §60.8 of 40 CFR Part 60, Subpart A, the permittee shall use as reference methods and procedures the test methods in Appendix A of 40 CFR Part 60 or other methods and procedures as specified in §63.474 of 40 CFR Part 60, Subpart UU, except as provided in §60.8(b) of 40 CFR Part 60, Subpart A.

(a) The permittee shall determine compliance with the particulate matter standards in §60.472 of 40 CFR Part 60, Subpart UU as follows:

(i) The emission rate (E) of particulate matter shall be computed for each run using the following equation:

$E = (c_s Q_{sd})/(PK)$

where:

E = emission rate of particulate matter, kg/Mg (lb/ton).

c_s = concentration of particulate matter, g/dscm (gr/dscf).

Q_{sd} = volumetric flow rate of effluent gas, dscm/hr (dscf/hr).

P = asphalt roofing production rate or asphalt charging rate, Mg/hr (ton/hr).

K = conversion factor, 1000 g/kg [7000 (gr/lb)].

(ii) Method 5A shall be used to determine the particulate matter concentration (c_s) and volumetric flow rate (Q_{sd}) of the effluent gas. For a saturator, the sampling time and sample volume for each run shall be at least 120 minutes and 3.00 dscm (106 dscf).

(iii) For the saturator, the asphalt roofing production rate (P) for each run shall be determined as follows: The amount of asphalt roofing produced on the shingle or saturated felt process lines shall be obtained by direct measurement. The asphalt roofing production rate is the amount produced divided by the time taken for the run.

c. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

d. 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

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).

e. 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.

f. 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.

g) Miscellaneous Requirements

(1) None.