



State of Ohio Environmental Protection Agency

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MAILING ADDRESS:

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P.O. Box 1049
Columbus, OH 43216-1049

12/3/2008

Certified Mail

George Bonin
Johns Manville
925 Carpenter Road
Defiance, OH 43512

No	TOXIC REVIEW
Yes	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
Yes	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0320010005
Permit Number: P0103686
Permit Type: Administrative Modification
County: Defiance

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Crescent-News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Johns Manville

Issue Date: 12/3/2008
Permit Number: P0103686
Permit Type: Administrative Modification
Permit Description: Administrative modification of PTI 03-17389 issued April 22, 2008.
Facility ID: 0320010005
Facility Location: Johns Manville
925 Carpenter Road,
Defiance, OH 43512
Facility Description: Mineral Wool Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination (The netting determination presented below is associated with an administrative modification of PTI 03-17389 issued April 22, 2008 to correct an error associated with the originally established VOC emission limitations. The netting summary below was revised accordingly with the change in the VOC emissions.)

2. Source Description:

Johns Manville owns and operates a multi-plant fiberglass insulation and building products manufacturing facility in Defiance Ohio. The facility currently consists of two operating plants which are designated as Plant 02 and Plant 08. A third plant (Plant 03) was part of the manufacturing facility until destroyed in a fire. Emission reductions associated with the loss of the third plant are being applied towards netting calculations.

3. Facility Emissions and Attainment Status:

The facility is a major stationary source with emissions of particulate matter 10 microns or less in size (PM10), carbon monoxide (CO), and volatile organic compounds (VOC) each in excess of 100 tons per year major source threshold (facility is classified as a glass fiber processing plant under USEPA new source review list of 28 source categories). Defiance County is classified as attainment for all pollutants.

4. Source Emissions:

The proposed project involves a mix of existing equipment and upgraded equipment to produce a high efficiency version of air filtration media. The net emissions increase for just the project exceeds the PSD significance thresholds for PM10 and CO. Net emission increases for just the project for VOC, nitrogen oxide, and sulfur dioxide did not exceed PSD significance thresholds. A contemporaneous netting analysis shows the PSD threshold is not exceeded for PM10. The contemporaneous decreases include future shutdowns of emissions units on a schedule established as federally enforceable requirement in PTI 03-17015 issued January 2, 2006. The net emission increase for CO exceeds the PSD significant threshold based on both the increase for the "project" and for contemporaneous changes.

Project Allowables

OEPA ID	Source Description	PM10	CO	VOC
P013	Plant 8 forming and collection unit #84	43.76	262.80	14.02
P091	Plant 8 forming and collection unit #85	43.76	262.80	14.02
P092	Plant 8 forming and collection unit #87	43.76	262.80	32.89
	TOTALS	131.28	788.40	60.93

Past actuals or allowables

OEPA ID	SOURCE	PM ₁₀	CO	VOC
P013	Plant 8 forming and collection unit #84	27.39	28.02	27.73



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P091	Plant 8 forming and collection unit #85	0	0	0
P092	Plant 8 forming and collection unit #87	32.46	33.20	32.89
	TOTALS	59.85	61.22	60.62

Increase in emissions from modification of project sources:

OEPA ID	SOURCE	PM ₁₀	CO	VOC
P013	Plant 8 forming and collection unit #84	16.37	234.78	(13.71)
P091	Plant 8 forming and collection unit #85	43.76	262.80	14.02
P092	Plant 8 forming and collection unit #87	11.29	229.60	0
	Totals	71.42	727.18	0.31

Contemporaneous Increases:

Construction Date	PTI#	OEPA ID	Source description	PM10	CO
10/03	03-13943	P009	Plant 2 forming and collection unit #24 (modification)	17.53	0.00
09/04	03-16145	P013	Plant 8 forming and collection unit #24	13.13	15.11
11/06	03-16294	P060	Plant 8 batch receiving	0.18	0.00
05/07	03-16294	P061	Plant 8 electric melter#1	1.49	3.90
02/07	03-16294	P062	Plant 8 electric melter#2	1.49	3.90
02/07	03-16294	P063	Plant 8 electric melter#3	1.49	3.90
07/07	03-16294	P064	Plant 8 pipe collection 801	11.78	8.85
07/07	03-16294	P065	Plant 8 sear roll and curing oven 801	2.45	5.43
07/07	03-16294	P066	Plant 8 product finishing unit 801	1.14	0.00
05/07	03-16294	P067	Plant 8 pipe collection 802	11.78	8.85
05/07	03-16294	P068	Plant 8 sear roll and curing oven 802	2.45	5.43
05/07	03-16294	P069	Plant 8 product finishing unit 802	1.14	0.00
03/07	03-16294	P070	Plant 8 pipe collection 803	11.78	8.85
03/07	03-16294	P071	Plant 8 sear roll and curing oven 803	2.45	5.43
03/07	03-16294	P072	Plant 8 product finishing unit 803	1.14	0.00
02/07	03-16294	P073	Plant 8 pipe collection 804	11.78	8.85
11/06	03-16294	P074	Plant 8 sear roll and curing oven 804	2.45	5.43
11/06	03-16294	P075	Plant 8 product finishing unit 804	1.14	0.00
02/07	03-16294	P076	Plant 8 pipe collection 805	17.65	8.85
02/07	03-16294	P077	Plant 8 sear roll and curing oven 805	3.64	8.15
02/07	03-16294	P078	Plant 8 product finishing unit 805	1.71	0.00
02/07	03-16294	P079	Plant 8 pipe collection 806	17.65	8.85
08/06	03-16294	P080	Plant 8 sear roll and curing oven 806	3.64	8.15
08/06	03-16294	P081	Plant 8 product finishing unit 806	1.71	0.00
03/07	03-16294	P082	Plant 8 pipe collection 807	26.50	8.85
03/07	03-16294	P083	Plant 8 sear roll and curing oven 807	5.48	12.22
03/07	03-16294	P084	Plant 8 product finishing unit 807	2.58	0.00



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02/07	03-16294	P085	Plant 8 offline sear roll and curing oven	0.61	1.36
02/07	03-16294	P086	Plant 8 offline product finishing unit	0.31	0.0
04/05*	03-16294	P087	Plant 8 reclaim refeed system	1.88	0.00
04/05*	03-16294	P088	Plant 8 GDC Oven1	1.62	3.46
04/05*	03-16294	P089	Plant 8 GDC Oven 2	1.62	3.46

Contemporaneous Increases (continued):

Construction Date	PTI#	OEPA ID	Source description	PM10	CO
04/05*	03-16294	P090	Plant 8 GDC Product finishing	1.23	0.00
11/06	03-16294	deminimis	Plant 8 Emergency Generator (750 kW-diesel)	0.20	0.61
11/06	03-16294	deminimis	Plant 8 housekeeping system	0.92	0.00
11/06	03-16294	deminimis	Plant 8 process area heaters (3 @ 5 mmbtu ea.)	0.48	2.78
11/06	03-16294	deminimis	Plant 8 warehouse heaters (5@ 1 mm btu ea.)	0.18	0.93
04/06	03/17015	P093	Plant 8 line #87 curing operation (modification)	5.08	10.78
03/07	03-17015	P029	Plant 8 Line #86 curing operation (modification)	1.85	5.62
10/07	03-17015	P015	Plant 8 Line #86 forming and collection	15.97	16.59
*	03-17015	P012	Plant 8 Line#82 forming and collection (modification)	18.83	21.32
*	03-17015	P044	Plant 8 line#82 curing operation (modification)	3.02	7.23
*	03-17015	P094	Plant 8 Line #84 curing operation (modification)	0.81	0.40
*	03-17015	P095	Plant 8 Line #85 curing operation (modification)	1.96	3.95
			Total	233.92	217.49

* anticipated construction/startup; as of 11/01/07 increases have not yet occurred.

Contemporaneous Decreases:

Shutdown Date	OEPA ID	Source description	PM10	CO
5/03	P011	Plant 3 P011 line 31 collection	15.90	7.50
05/03	P012	Plant 3 P012 line 32 collection	23.90	12.50
05/03	P013	Plant 3 P013 line 33 collection	14.20	8.80
05/03	P014	Plant 3 P014 line 34 collection	16.60	15.80
05/03	P015	Plant 3 P015 line 35 collection	23.20	15.50
05/03	P016	Plant 3 P016 line 36 collection	31.30	25.0
05/03	P042	Plant 3 P042 line 37 collection	15.80	8.5
05/03	P049	Plant 3 P049 line 30 sear roll and curing	2.30	4.70
05/03	P017	Plant 3 P017 line 31 sear roll	0.10	1.30
05/03	P018	Plant 3 P018 line 32 sear roll	0.10	2.50
05/03	P019	Plant 3 P019 line 33 sear roll	0.10	1.80
05/03	P020	Plant 3 P020 line 34 sear roll	0.20	3.20
05/03	P020	Plant 3 P021 line 35 sear roll	0.20	3.20
05/03	P022	Plant 3 P022 line 36 sear roll	0.30	5.30
05/03	P043	Plant 3 P043 line 37 sear roll and curing	2.0	4.90
05/03	P051	Plant 3 P051 line 38 sear roll and curing	8.80	17.90



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05/03	P023	Plant 3 P023 line 31 curing oven	0.80	0.70
05/03	P024	Plant 3 P024 line 32 curing oven	1.60	1.40
05/03	P025	Plant 3 P025 line 33 curing oven	1.10	1.00
05/03	P026	Plant 3 P026 line 34 curing oven	2.10	1.80
05/03	P027	Plant 3 P027 line 35 curing oven	2.10	1.80
05/03	P028	Plant 3 P028 line 36 curing oven	3.40	2.90

Contemporaneous Decreases (continued):

Shutdown Date	OEPA ID	Source description	PM10	CO
05/03	P003	Plant 3 P003 handwrap 36 product curing	0.10	0.10
05/03	P040	Plant 3 P040 hand wrap 38 product curing	0.10	0.10
05/03	P050	Plant 3 P050 line 30 product finishing unit	0.10	0.00
05/03	P031	Plant 3 P031 line 31 product finishing unit	0.50	0.00
05/03	P032	Plant 3 P032 line 32 product finishing unit	0.90	0.00
05/03	P033	Plant 3 P033 line 33 product finishing unit	0.6	0.0
05/03	P034	Plant 3 P034 line 34 product finishing unit	1.10	0.0
05/03	P035	Plant 3 P035 line 35 product finishing unit	1.10	0.0
05/03	P036	Plant 3 P036 line 36 product finishing unit	1.80	0.0
05/03	P044	Plant 3 P044 line 37 product finishing unit	1.20	0.0
05/03	P052	Plant 3 P052 line 38 product finishing unit	0.40	0.0
05/03	P048	Plant 3 P048 handwrap 36/38 product	0.10	0.0
05/03	deminimis	Plant 3 QC oven	1.00	0.0
05/03	deminimis	Plant 3 paint room	2.40	0.0
05/03	deminimis	Plant 3 compactor air makeup	0.20	1.8
05/03	deminimis	Plant 3 roof air makeup	0.20	1.8
05/03	deminimis	Plant 3 dock b -north wall make up	0.10	1.3
05/03	deminimis	Plant 3 cold resin room roof air make up	0.10	0.9
05/03	deminimis	Plant 3 hot end air make up	0.10	1.3
05/03	deminimis	Plant 3 space heaters	0.10	1.1
05/03	deminimis	Plant 3 prereact hot water heater	0.0	0.4
05/03	deminimis	Plant 3 steam generators	0.0	0.4
05/03	deminimis	Plant 3 marble unloading (fug)	0.10	0.0
05/03	deminimis	Plant 3 bailer for edge trim (fug)	1.20	0.0
05/03	deminimis	Plant 3 prereact tanks	0.10	0.0
05/03	deminimis	Plant 3 binder mix tanks (14)	0.10	0.0
12/05	P011	Plant 2 P011 Line #26 forming & collection	19.32	14.52
11/07	P012	Plant 2 P012 Line #27 forming & collection	36.19	44.04
*	P010	Plant 2 P010 Line #25 forming & collection	35.45	22.80
*	P009	Plant 2 P009 Line #24 forming & collection	30.55	80.95
*	P008	Plant 2 P008 Line #23 forming and collection	25.33	80.67
*	P016	Plant 2 P016 Line #23 curing operation	1.36	4.18
		TOTAL DECREASES	328.00	404.36

*future decreases (see section B)



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Facility ID: 0320010005

5. Conclusion:

Based on the results of a contemporaneous netting analysis, PM10 and VOC emissions for this proposed modification do not exceed the PSD significance threshold. The net emissions increase for CO is significant and requires a PSD review of CO emissions. The net change in emissions due to the installation/modifications contained in this PTI over the contemporaneous time period will be net decreases of 22.66 TPY of PM₁₀, and a net increase of 540.31 tpy of CO.

6. Please provide additional notes or comments as necessary:
None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	788.40
PM10	131.28
VOC	60.93
SO2	2.64
NOx	16.17



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install
for
Johns Manville**

Facility ID: 0320010005
Permit Number: P0103686
Permit Type: Administrative Modification
Issued: 12/3/2008
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Johns Manville

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Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103686

Facility ID: 0320010005

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0320010005

Facility Description: Fiberglass manufacturing

Application Number(s): M0000210

Permit Number: P0103686

Permit Description: Administrative modification of PTI 03-17389 issued April 22, 2008.

Permit Type: Administrative Modification

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 12/3/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Johns Manville
925 Carpenter Road
Defiance, OH 43512

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103686

Facility ID: 0320010005

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0103686

Permit Description: Administrative modification of PTI 03-17389 issued April 22, 2008.

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

Emissions Unit ID:	P092
Company Equipment ID:	Unit 87 - Forming and Collection
Superseded Permit Number:	03-17389
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103686

Facility ID: 0320010005

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- 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 state-only required 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 Ohio EPA DAPC, Northwest District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103686

Facility ID: 0320010005

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The permittee shall shutdown the following Plant 2 emissions units according to the Defiance Consolidation Timeline schedule submitted in the application for this PTI :

Table 1. - Future decreases due to shutdown sources

Ohio EPA ID	Source Description
P010	Line#25 forming and collection
P009	Line#24 forming and collection (PTI 03-13943 issued May 22, 2003)
P008	Line#23 forming and collection (PTI 03-13943 issued May 22, 2003)
P016	Line #23 curing operation

3. The permittee shall notify the agency within 30 days of ceasing operation of emissions unit P010, P009, P008 and P016. The notification shall contain the exact shut down date of the emissions unit.



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C. Emissions Unit Terms and Conditions



1. P092, Unit 87 - Forming and Collection

Operations, Property and/or Equipment Description:

Line 87 forming and collection [**Administrative modification of PTI 03-17389 issued April 22, 2008 to correct an error associated with the established VOC emission limitations**]

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 3745-31-10 through 20	Carbon monoxide (CO) emissions shall not exceed 60.0 lbs/hr and 262.80 tons per rolling 12-month period. See b)(2)a. and Section B.
b.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Particulate matter equal to or less than 10 microns in size (PM ₁₀) emissions shall not exceed 9.99 pounds per hour (lbs/hr) and 43.76 tons per year (tpy). [See b)(2)c.] Volatile organic compounds (VOC) emissions shall not exceed 7.51 lbs/hr and 32.89 tpy.
d.	OAC rule 3745-17-07(A)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	40 CFR Part 63, Subpart NNN	See b)(2)e.
f.	OAC rule 3745-21-07(G)(2)	None [see c)(1)].



g.	OAC rule 3745-17-11(B)	The emission limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-21-08(B)	See b)(2)d.
i.	OAC rule 3745-114-01 ORC 3704.03(F)	See Section B.
j.	OAC rule 3745-18-06(E)	See b)(2)f.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for CO were cost effective.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxides (NOx) and sulfur dioxide (SO2) emissions from this air contaminant source since the uncontrolled potential to emit for each pollutant is less than ten tons per year.

The potential to emit for NOx emissions for this emissions unit is 5.39 tpy; determined by multiplying the maximum hourly emission rate of 1.23 lbs/hr (as determined by stack testing) by the maximum operating schedule of 8760 hours per year.

The potential to emit for SO2 emissions for this emissions unit is 0.88 tpy; determined by multiplying the maximum hourly emission rate of 0.20 lbs/hr (as determined by stack testing) by the maximum operating schedule of 8760 hours per year.

- c. All particulate matter emissions are PM10.
- d. The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- e. 40 CFR Part 63 Subpart NNN is not applicable to existing flame attenuation lines producing bonded heavy-density product. For the purpose of 40 CFR 63 Subpart NNN, this modified emissions unit is still considered an existing emissions unit. (The modifications performed do not constitute reconstruction as defined in 40 CFR 63.2)



- f. The potential to emit for SO₂ from this emissions unit [see b)(2)b.] is less than the allowable emission limitation established pursuant to this rule.
- c) Operational Restrictions
 - (1) The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01, is prohibited.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform checks at least five (5) days per week, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from 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 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.
 - (2) Notwithstanding the frequency of reporting requirements specified in f), the permittee may reduce the frequency of visual observations for this emissions unit from at least 5 days per week to weekly readings if the following conditions are met:
 - a. for one (1) full quarter the facility's visual observations indicate no abnormal visible emissions; and
 - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in d)(1).

The permittee shall revert to five (5) days per week readings if any abnormal visible emissions are observed.
 - (3) The permittee shall maintain monthly records of the following information for this emissions unit:



- a. the company identification for each liquid organic material employed in this emissions unit; and
- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) The permittee shall notify the Director (Northwest District Office) in writing of any monthly record showing the use of any photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office or local air agency) within 30 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations: 9.99 lbs PM₁₀/hr, 43.76 tpy PM₁₀

Applicable Compliance Method: The hourly allowable PM₁₀ limitation was established by multiplying the maximum glass pull rate (tons/hr) [as indicated in the permit application] by an emission factor (lb/lb of glass) derived from stack testing of a similar emissions unit. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- b. Emission Limitations: 60.0 lbs CO/hr, 262.80 tons CO per rolling 12-month period

Applicable Compliance Method: The hourly allowable CO emission limitation was established by multiplying the maximum glass pull rate (tons/hr) [as indicated in the permit application] by an emission factor (lb/lb of glass) derived from stack testing of a similar emissions unit. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission



limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- c. Emission Limitations: 7.51 lbs VOC/hr, 32.89 tons VOC/yr

Applicable Compliance Method: The hourly allowable VOC emission limitation was established by multiplying the maximum glass pull rate (lb/hr) [as indicated in the permit application] by an emission factor (lb/lb of glass) derived from stack testing of a similar emissions unit. If required, the permittee shall demonstrate compliance by testing in accordance with Method 1-4, and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

- d. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- g) Miscellaneous Requirements

- (1) None.