



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

10/7/2010

Certified Mail

Brian Thomas  
Owens Corning Roofing and Asphalt, LLC  
890 W. Smith Road  
Medina, OH 44256

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1652050040  
Permit Number: P0106935  
Permit Type: Administrative Modification  
County: Medina

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI 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 Kevin Boyce," 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  
309 South Fourth Street, Room 222  
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
ARAQMD; Canada





**FINAL**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Owens Corning Roofing and Asphalt, LLC

Facility ID: 1652050040  
Permit Number: P0106935  
Permit Type: Administrative Modification  
Issued: 10/7/2010  
Effective: 10/7/2010





Division of Air Pollution Control
Permit-to-Install
for
Owens Corning Roofing and Asphalt, LLC

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## Authorization

Facility ID: 1652050040  
Facility Description: Asphalt Felts and Coatings.  
Application Number(s): M0000975  
Permit Number: P0106935  
Permit Description: Modification to establish BAT not previously done in PTI 16-02464.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 10/7/2010  
Effective Date: 10/7/2010

This document constitutes issuance to:

Owens Corning Roofing and Asphalt, LLC  
890 W. Smith Road  
Medina, OH 44256

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:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

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



## **Authorization (continued)**

Permit Number: P0106935  
Permit Description: Modification to establish BAT not previously done in PTI 16-02464.

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

<b>Emissions Unit ID:</b>	<b>P912</b>
Company Equipment ID:	MLA System
Superseded Permit Number:	16-02464
General Permit Category and Type:	Not Applicable



## **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 of 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 Akron Regional Air Quality Management District.

- (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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

- 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 Akron Regional Air Quality Management District. 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 by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown 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 reporting requirements identified in this permit 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 deviation report, 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.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**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.

## **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.

## **C. Emissions Unit Terms and Conditions**



1. P912, MLA System

Operations, Property and/or Equipment Description:

MLA System - MLA melt tank, MLA use tank, MLA filler hopper, MLA mix tank, MLA applicator pan (3-Wide roofing line) - controlled with a fiber bed filter and dust collector.

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 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), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions shall not exceed 3.86 pounds per hour, and 15.78 tons per year.</p> <p>Particulate emissions (PE/PM10) shall not exceed 0.08 pounds per hour, and 0.35 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.97 pounds per hour, and 4.17 tons per year.</p> <p>Hydrogen sulfide (H<sub>2</sub>S) emissions shall not exceed 0.36 pounds per hour, and 1.58 tons per year.</p> <p>The hourly limitations are based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limitations.</p> <p>See b)(2)a below.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b below.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-07(B)	Visible PE of fugitive dust shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 20% opacity as a 3-minute average.
e.	OAC rule 3745-17-08	Emissions from the MLA system shall be vented to a fiber bed filter and/or dust collector.
f.	OAC rule 3745-17-11(B)	PE shall not exceed 4.94 pounds per hour. (based on process weight rate of 1.32 tons per hour and Table I)
g.	OAC rule 3745-21-07(G)(2)	Exempt. Asphalt is not a photochemically reactive material.  See b)(2)c below.
h.	40 CFR Part 63, Subpart LLLLLL	The PE from the coater, coating mixer, sealant applicator, and adhesive applicator on the 3-wide roofing line shall not exceed 0.04 kilogram per megagram (kg/Mg) [0.08 pound per ton, lb/ton] of asphalt shingle or mineral-surfaced roll roofing produced.  See sections d)(3) through d)(12) and e)(4) below.
i.	40 CFR 63.1 - 15	Table 7 to Subpart LLLLLL of 40 CFR Part 63 - Applicability of General Provisions to Subpart LLLLLL shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO and H<sub>2</sub>S emissions from this air contaminant source since the uncontrolled potential to emit for CO and H<sub>2</sub>S is less than 10 tons/year.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM<sub>10</sub> emissions from this air contaminant source since the potential to emit, taking into account air pollution controls, for PM<sub>10</sub> is less than 10 tons/year.

- c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio.
- d. The emissions from the MLA Melt Tank, MLS Use Tank, MLA Applicator, and MLA Mix Tank shall be vented to the fiber bed filter at all times the emissions unit is in operation. The emissions from the MLA Filler Hopper and MLA Mix Tank shall be vented to the dust collector at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the pressure drop across the fiber bed filter shall be maintained within the normal established operating range while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and any visible emissions of fugitive dust. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee shall maintain records of the inlet gas temperature and pressure drop data along with the 3-hour averages of the inlet gas temperature and pressure drop.
- (3) The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following:

- a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period;
  - b. to determine the 3-hour average, the permittee must:
    - i. have a minimum of four successive cycles of operation to have a valid hour of data;
    - ii. have valid data from at least three of four equally spaced data values for that hour from a CPMS that is not out-of-control according to the permittee's site-specific monitoring plan; and
    - iii. determine the 3-hour average of all recorded readings for each operating day, except as stated in section 63.8690(c) (the permittee must have at least two of the three hourly averages for that period using only hourly average values that are based on valid data (i.e., not from out-of-control periods)); and
  - c. the permittee must record the results of each inspection, calibration, and validation check.
- (4) For each temperature monitoring device, the permittee must meet the requirements in section d)(2) and the following:
- a. locate the temperature sensor in a position that provides a representative temperature;
  - b. for a noncryogenic temperature range, use a temperature sensor with a minimum measurement sensitivity of 2.8 degrees C or 1.0 percent of the temperature value, whichever is larger;
  - c. if a chart recorder is used, it must have a sensitivity in the minor division of at least 20 degrees F;
  - d. perform an accuracy check at least semiannually or following an operating parameter deviation:
    - i. according to the procedures in the manufacturer's documentation; or
    - ii. by comparing the sensor output to redundant sensor output; or
    - iii. by comparing the sensor output to the output from a calibrated temperature measurement device; or
    - iv. by comparing the sensor output to the output from a temperature simulator;
  - e. conduct accuracy checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor; and

- f. at least quarterly or following an operating parameter deviation, perform visual inspections of components if redundant sensors are not used.
- (5) For each pressure measurement device, the permittee must meet the requirements of section d)(2) and the following:
- a. locate the pressure sensor(s) in, or as close as possible to, a position that provides a representative measurement of the pressure;
  - b. use a gauge with a minimum measurement sensitivity of 0.12 kiloPascals or a transducer with a minimum measurement sensitivity of 5 percent of the pressure range;
  - c. check pressure tap pluggage daily. Perform an accuracy check at least quarterly or following an operating parameter deviation:
    - i. according to the procedures in the manufacturer's documentation; or
    - ii. by comparing the sensor output to redundant sensor output; and
  - d. conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range or install a new pressure sensor;
  - e. at least monthly or following an operating parameter deviation, perform a leak check of all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage; and
  - f. at least quarterly or following an operating parameter deviation, perform visible inspections on all components if redundant sensors are not used.
- (6) For monitoring parameters other than temperature and pressure drop, the permittee must install and operate CPMS to provide representative measurements of the monitored parameters.
- (7) As an option to installing the CPMS specified in section d)(2), the permittee may install a continuous emissions monitoring system (CEMS) or a continuous opacity monitoring system (COMS) that meets the requirements specified in section 63.8 and the applicable performance specifications of 40 CFR Part 60, Appendix B.
- (8) For each monitoring system required in this section, the permittee must develop and make available for inspection by the permitting authority, upon request, a site-specific monitoring plan that addresses the following:
- a. installation of the CPMS, CEMS, or COMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);
  - b. performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction system; and

- c. performance evaluation procedures and acceptance criteria (e.g., calibrations).
- (9) The site-specific monitoring plan must also address the following:
- a. ongoing operation and maintenance procedures in accordance with the general requirements of sections 63.8(c)(1), (c)(3), (c)(4)(ii), (c)(7), and (c)(8);
  - b. ongoing data quality assurance procedures in accordance with the general requirements of section 63.8(d); and
  - c. ongoing record keeping and reporting procedures in accordance with the general requirements of sections 63.10(c), (e)(1), and (e)(2)(i).
- (10) The permittee must conduct a performance evaluation of each CPMS, CEMS, or COMS in accordance with the site-specific monitoring plan.
- (11) The permittee must operate and maintain the CPMS, CEMS, or COMS in continuous operation according to the site-specific monitoring plan.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the fiber bed filter was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fiber bed filter;
  - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in "a" 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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from the stack serving this emissions unit or any visible emissions of fugitive dust were observed and (b) describe any corrective

actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Akron RAQMD) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (4) The permittee shall submit compliance reports that contain the information required by 40 CFR 63.8693(c). The reports shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. The compliance reports must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
  - (5) The permittee shall submit with the initial stack test report, documentation of the determined normal pressure range, in inches of water, for the fiber bed filter.
- f) Testing Requirements
- (1) Compliance with the emission limitations in section b)(1) 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 visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
    - b. Emission Limitation:  
  
Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.  
  
Applicable Compliance Method:  
  
If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
    - c. Emission Limitation:  
  
4.94 lbs PE/hr  
  
PE/PM10 shall not exceed 0.08 pounds per hour, and 0.35 tons per year.  
  
Applicable Compliance Method:  
  
If required, compliance with the lbs/hr emission limitation shall be demonstrated based upon the test results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

d. Emission Limitation:

Total PE from the coater, coating mixer, sealant applicator, and adhesive applicator on the 3-wide roofing line to 0.04 kilogram per megagram (kg/Mg) (0.08 pound per ton, lb/ton) of asphalt shingle or mineral-surfaced roll roofing produced.

Applicable Compliance Method:

To determine compliance with the particulate emission rate, use Equations 1 and 2 as follow:

$$E = \text{Mpm} / P \quad (\text{Eq. 1})$$

Where:

E = Particulate emissions, kilograms of particulate per megagram of roofing product manufactured;

Mpm = Particulate hourly emission rate, kilograms per hour, determined using Equation 2; and

P = The asphalt roofing product manufacturing rate during the emissions sampling period, including and material trimmed from the final product, megagram per hour.

$$\text{Mpm} = C * Q * K \quad (\text{Eq. 2})$$

Where:

Mpm = Particulate hourly emission rate, kilograms per hour;

C = concentration of particulate on a dry basis, grams per dry standard cubic meter (g/dscm), as measured by the test method specified in Table 3 of 40 CFR 63, Subpart LLLLLL;

Q = Vent gas steam flow rate (dry standard cubic meters per minute) at a temperature of 20 degrees C, as measure by the test method specified in Table 3 of 40 CFR 63, Subpart LLLLLL;

K = Unit conversion constant (0.06 minute-kilogram / hour-gram).

e. Emission Limitation:

3.86 lbs/hr of VOC

15.78 tpy VOC

Applicable Compliance Method:

If required, compliance with the hourly allowable VOC emission limitation shall be based upon the results of emission testing conducted in accordance with Methods 1 through 4, and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual limitation shall be ensured as long as compliance with the lb/hr limitation and the annual throughput/production limitations (as required for emissions unit P906) are maintained.

f. Emission Limitation:

CO emissions shall not exceed 0.97 pounds per hour, and 4.17 tons per year.

Applicable Compliance Method:

If required, compliance with the hourly allowable VOC emission limitation shall be based upon the results of emission testing conducted in accordance with Methods 1 through 4, and 10, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual limitation shall be ensured as long as compliance with the lb/hr limitation and the annual throughput/production limitations (as required for emissions unit P906) are maintained.

g. Emission Limitation:

H<sub>2</sub>S emissions shall not exceed 0.36 pounds per hour, and 1.58 tons per year.

Applicable Compliance Method:

If required, compliance with the hourly allowable VOC emission limitation shall be based upon the results of emission testing conducted in accordance with Methods 1 through 4, and 11, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

- (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 no later than 180 days after the compliance date for 40 CFR 63, Subpart LLLLLL.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulate.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for PE, Methods 1 thru 5 of 40 CFR Part 60, Appendix A.

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

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).
- f. Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD 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 Akron RAQMD.

g) **Miscellaneous Requirements**

- (1) None.