



Environmental  
Protection Agency

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

11/23/2010

Amadou Demba  
SOPREMA USA INC  
310 QUADRAL DR  
WADSWORTH, OH 44281

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652100083  
Permit Number: P0106998  
Permit Type: OAC Chapter 3745-31 Modification  
County: Medina

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. 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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the 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: ARAQMD





**FINAL**

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

Facility ID: 1652100083  
Permit Number: P0106998  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 11/23/2010  
Effective: 11/23/2010  
Expiration: 8/18/2020





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

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## Authorization

Facility ID: 1652100083  
Application Number(s): A0040428  
Permit Number: P0106998  
Permit Description: Ch. 31 Modification to remove production restrictions.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,000.00  
Issue Date: 11/23/2010  
Effective Date: 11/23/2010  
Expiration Date: 8/18/2020  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SOPREMA USA INC  
310 QUADRAL DR  
WADSWORTH, OH 44281

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

Ohio 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 this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0106998  
Permit Description: Ch. 31 Modification to remove production restrictions.

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>P901</b>
Company Equipment ID:	Roofing Products Line
Superseded Permit Number:	P0106523
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

## **B. Facility-Wide Terms and Conditions**

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

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



1. P901, Roofing Products Line

Operations, Property and/or Equipment Description:

Asphalt shingle manufacturing using asphalt mixers, saturator coater, and granules (sand) applicator. Emissions from the asphalt mixers are vented to and controlled by a wet scrubber. The purpose of this permit is to remove the maximum annual smooth-surfaced roll roofing production rate limitation that was established in Permit to Install 16-02089 issued 01/04/2001, thus allowing a change in the method of operation of emissions unit P901 (per the definition of "modification" under OAC rule 3745-31-01(QQQ)) to unrestricted production. Consequently, the annual particulate emissions limitation will be allowed to increase from 22.94 tons per year in previous permits to 56.24 tons per year in this permit. The annual organic compound emission limitation will not change from previous permits since it was established based on the potential to emit. For the wet scrubber, new terms specific to the in situ emissions control device are provided to replace irrelevant terms written in previous permits. This permit, P0106998, replaces all previous air permits for P901, Roofing Products Line.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Visible particulate emissions (PE) from any stack shall not exceed twenty percent opacity, as a six-minute average.  Visible PE from fugitive dust shall not exceed twenty percent opacity, as a three-minute average.  PE from the saturator stack shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>exceed 1.0 pound per hour when producing mineral-surfaced roll roofing products; and 10.0 pounds per hour when producing smooth-surfaced roll roofing products.</p> <p>PE from the sand applicator stack shall not exceed 2.0 pounds per hour. Hoods, fans and other equipment shall adequately capture, enclose, contain and vent PE to the stack.</p> <p>The emissions from the asphalt mixers shall be vented to the wet scrubber at all times the emissions unit is in operation. PE from the scrubber stack shall not exceed 0.84 pound per hour and 0.030 grain per dry standard cubic foot of exhaust gases.</p> <p>Total PE from the saturator, sand applicator, and asphalt mixers shall not exceed 56.24 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 3.25 pounds per hour and 14.24 tons per year.</p> <p>The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.</p> <p>The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of 40 CFR Part 60, Subpart UU.</p>
b.	OAC rule 3745-21-07	<p>The emissions limitations specified by this rule are equivalent to the emissions limitations and control requirements established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)c and c)(1).</p>
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-07(B) OAC rule 3745-17-08 OAC rule 3745-17-11	The emissions limitations and control requirements specified by these rules are equivalent to or less stringent than the emissions limitations and control



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements established pursuant to OAC rule 3745-31-05(A)(3) and/or 40 CFR Part 60, Subpart UU.
d.	40 CFR Part 60, Subpart UU	<p>No permittee shall cause to be discharged into the atmosphere from any saturator:</p> <p>particulate matter in excess of: 0.04 kilograms of particulate per megagram of asphalt shingle or mineral-surfaced roll roofing produced; or 0.4 kilograms of particulate per megagram of saturated felt or smooth-surfaced roll roofing produced;</p> <p>exhaust gases with opacity greater than 20 percent; and</p> <p>any visible emissions from a saturator capture system for more than 20 percent of any period of consecutive valid observations totaling 60 minutes.</p>

(2) Additional Terms and Conditions

- a. The hourly and annual mass PE and OC emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) are equal to the potential to emit of this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.
- b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in materials processed, change in the method of operation, or any other change of the emissions unit in this permit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.
- c. 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. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)b, c)(1), d)(4)b, and e)(4)a.

c) Operational Restrictions

- (1) The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

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

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

- a. the date and time the improper operation began;
- b. the date the investigation was conducted;
- c. the name(s) of the personnel who conducted the investigation;
- d. the findings and recommendations.
- e. a description of the corrective action;
- f. the date the corrective action was completed;
- g. the date and time the improper operation ended; and
- h. the name(s) of the personnel who performed the corrective action.

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

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and, when weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any non-stack egress points and/or the stack, the permittee shall also note the following in the operations log:
- a. the location on the emissions unit (stack or fugitive) and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee shall maintain the following information for this emissions unit:
- a. the MSDS sheets for each liquid organic material employed; and
  - b. documentation as to whether or not each material is a photochemically reactive material.
- e) Reporting Requirements
- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall identify in the annual PER the following information concerning the operations and performance of the wet scrubber during the 12-month reporting period for this emissions unit:

- a. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the wet scrubber, or when the wet scrubber was not in operation when the emissions unit was in operation, as well as the reason(s) the wet scrubber was not employed, based on the information recorded in d)(1) above
  - b. each period of time (start time and date, and end time and date) when the wet scrubber system was not operating properly, based on the information recorded in d)(2) above;
  - c. each incident described in “a” or “b” (above) where a prompt investigation was not conducted;
  - d. each incident described in “a” or “b” (above) where prompt corrective action was determined to be necessary and was not taken; and
  - e. each incident described in “a” or “b” (above) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in d)(1) and d)(2) above.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
- a. all days during which any visible emissions of fugitive dust were observed from non-stack egress points serving this emissions unit;
  - b. all days during which any visible particulate emissions were observed from any stack serving this emission unit; and
  - c. all corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (4) The permittee shall identify in the annual PER the following information concerning production during the 12-month reporting period for this emissions unit:
- a. each day any liquid organic material defined in OAC rule 3745-21-01(C)(5) as a photochemically reactive material was employed, including the quantity, in gallons, of each photochemically reactive material used, as well as the corrective actions that were taken to achieve compliance.
- 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 particulate emissions (PE) from any stack shall not exceed twenty percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Visible PE from fugitive dust shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitations:

PE from the saturator stack shall not exceed 1.0 pound per hour when producing mineral-surfaced roll roofing products; and 10.0 pounds per hour when producing smooth-surfaced roll roofing products;

PE from the sand applicator stack shall not exceed 2.0 pounds per hour; and

PE from the scrubber stack shall not exceed 0.84 pound per hour and 0.030 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

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

d. Emission Limitation:

Total PE from the saturator, sand applicator, and asphalt mixers shall not exceed 56.24 tons per year.

Applicable Compliance Method:

Multiply the combined allowable particulate emissions rate of 12.84 pounds per hour from the saturator, sand applicator and the asphalt mixers by 8760 hours per year, then divide by 2000.

e. Emission Limitations:

Organic compound (OC) emissions shall not exceed 3.25 pounds per hour and 14.24 tons per year.

Applicable Compliance Method:

Multiply the OC emissions factor of 0.26 pound of OC emissions per ton of product produced (AP-42, Table 11.2-4 dated 1/95) by the maximum hourly production rate.

f. Emission Limitations:

No permittee shall cause to be discharged into the atmosphere from any saturator particulate matter in excess of: 0.04 kilograms of particulate per megagram of asphalt shingle or mineral-surfaced roll roofing produced; or 0.4 kilograms of particulate per megagram of saturated felt or smooth-surfaced roll roofing produced.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5A and the procedures specified in 40 CFR 60.474(c)(2), and as specified below in section f)(2).

g. Emission Limitations:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR 60.11, and as specified below in section f)(2).

h. Emission Limitations:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A, modified so the readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8(c)) totaling 60 minutes (a performance test shall consist of one run), and as specified below in section f)(2).

- (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 within the six-month period prior to the renewal of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate matter from the saturator for the smooth-surfaced roll roofing products and for the mineral-surfaced roll roofing products.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
  - i. Method 5A of 40 CFR Part 60, Appendix A as describe in 40 CFR 60.474(c)(2) for the saturator for the smooth-surfaced roll roofing products and for the mineral-surfaced roll roofing products;
    - a. for the smooth-surfaced roll roofing products, the test shall be conducted while 6.8-kg (15-lb) felt is being produced; and
    - b. for the mineral-surfaced roll roofing products, the test shall be conducted while 106.6-kg (235-lb) shingle is being produced;
  - ii. The emission rate (E) of particulate matter shall be computed for each run using the following equation:

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

where:

E=emission rate of particulate matter, kg/Mg  
 c<sub>s</sub>=concentration of particulate matter, g/dscm (g/dscf)  
 Q<sub>sd</sub>=volumetric flow rate of effluent gas, dscm/hr (dscf/hr)  
 P=asphalt roofing production rate Mg/hr (ton/hr)  
 K=conversion factor, 1000 g/kg [907.2/(g-Mg)/(kg-ton)];

- iii. The asphalt roofing production rate (P) for each run shall be determined as follows:
 

The amount of asphalt roofing produced on the saturated felt process lines shall be obtained by direct measurements. The asphalt roofing production rate is the amount produced divided by the time taken for the run;
- iv. Method 9 of 40 CFR Part 60, Appendix A and procedures in 40 CFR 60.11 shall be used to determine the opacity for the stack exhaust; and
- v. Method 22 of 40 CFR Part 60, Appendix A, modified so that reading are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8(c)) totaling 60 minutes for the saturator capture system. A performance test shall consist of one run.

- 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 appropriate Ohio EPA District Office or local air agency.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) **Miscellaneous Requirements**
- (1) The requirements of this permit shall supersede only the requirements for P901, Roofing Products Line contained in any previously issued air permit. The requirements contained in any effective air permits for other emissions units at the facility shall remain in effect and are not affected by this permit action.