



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

2/10/2011

Certified Mail

Mark Arnold
Owens Corning Insulating Systems, LLC
400 Case Ave.
Newark, OH 43055-5893

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0145020185
Permit Number: P0107269
Permit Type: Initial Installation
County: Licking

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

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, The Newark Advocate. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. 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
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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, Central District Office at (614)728-3778.

Sincerely,


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

Cc: U.S. EPA Region 5 - Via E-Mail Notification
Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Owens Corning Insulation Systems, LLC (OCIS) operates a wool fiberglass insulation products manufacturing plant at 400 Case Avenue, Newark, Licking County. Currently, the Newark Plant operates under Title V permit 01-45-02-0185.

OCIS has proposed a new project to expand the capacity of the molded pipe insulation production operations at the Newark Plant. As part of the project OCIS will install a new in-line pipe machine (IPM) (P200, P201, and P202) as a replacement for the existing rigid section molding machine (RSM) (P183 and P189). Additionally, OCIS will install a new, all-electric furnace (P203) and dust collector as a replacement for the existing A-3 furnace (P129). This activity is being permitted in PTI No. P0107269 and P0107520.

This permit write-up determines if the permitting action proposed under PTI No. P0107269 (Installation of P200, P201, P202, and P203) and PTI No. P0107520 (Chapter 31 Modification of emission units P130, P143, and P025 to account for changes resulting from the project and to establish synthetic minor limitations for VOC) constitute a Major Modification as defined by OAC rule 3745-01(JJJ).

Significant Modification Evaluation:

Objective: Determine if the permitting action proposed under P0107269 and P0107520 constitute a Major Modification as defined by OAC rule 3745-31-01(JJJ).

Methodology: In accordance with OAC rule 3745-31-01(TTT), one must use the following procedure for installation of new units.

Step 1. Calculate whether a significant emissions increase will occur.

- a. Calculate the sum of the difference between the potential to emit from each new and existing emissions unit following completion of the NSR project and the baseline actual emission for these units before the NSR project. [OAC rule 3745-31-01(JJJ)(4)(a-b)]

**Table I:
New and Existing Emissions Units – Potential to Emit Minus Baseline Actual**

Emission Units (EU)	EU Description	Emission Type	Emissions (tpy)								
			PM	PM10	PM2.5	VOC	SO2	NOx	CO	CO ₂ e	Lead
P025	A3 Conditioning Channel / Forehearth	Potential	9.08	8.99	8.99	0.08	0.27	1.60	1.30	1807.24	1.50E-02
		Baseline	4.44	4.44	4.44	0.02	0.02	0.40	0.33	474.00	8.00E-03
		Difference	4.64	4.55	4.55	0.06	0.25	1.20	0.97	1329.53	7.00E-03

	ers										
P203	A3 Elect ric Furn ace	Potential	1.15	1.15	0.98	0.00	0.09	1.31	2.80	5231.40	7.20E-05
		Baseline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00E+00
		Difference	1.15	1.15	0.98	0.00	0.09	1.31	2.80	5231.40	7.20E-05
Total		Potential	206.56	205.90	175.38	54.86	9.61	32.53	33.02	28411.43	1.51E-02
		Baseline	89.78	89.78	78.18	14.30	2.44	3.58	26.83	1986.00	8.00E-03
		Difference	116.8	116.1	97.2	40.6	7.2	29.0	65.5	26425.4	7.08E-03

- b. If the values are greater than the significance level for the pollutants in question, then a significant emissions increase has occurred.

**Table II:
Summary Table**

Pollutant	Project Emissions Increase (tpy) (From Table I)	Trigger Levels	Significant Emissions Increase?
PM	116.8	25	Yes
PM10	116.1	15	Yes
PM2.5	97.2	10	Yes
VOC	40.6	40	Yes
SO2	7.2	40	No
NOX	29.0	40	No
CO	65.5	100	No
CO ₂ e	26425.4	75,000	No
Pb	7.08E-03	0.6	No

Therefore, a significant modification will occur.

Step 2. Calculate whether a net emissions increase will occur.

- a. With respect to any regulated NSR pollutant emitted by a major stationary source, the amount by which the sum of (1) an increase in emissions; and (2) contemporaneous increases/decreases, exceeds zero. [OAC rule 3745-31-01 (TTT)]

Three distinct projects contributed to the contemporaneous emissions increases/decreases summarized in the following table:

1. Shutdown of the D-5 Insulation Line.

Upon issuance of this permit OCIS will permanently shutdown (and surrender all existing permits for) the D-5 Insulation Line. This action will result in the permanent shutdown of the following emission units:

- P006 – D-5 Furnace
- P024 – D-5 Conditioning Channel and Forehearth
- P028 – D-5 Forming Section
- P064 – D-5 Curing Oven
- P072 – D-5 Cooling Section
- P167 – D-5 Batch Charge Area
- P181 – D-5 Asphalt Coating & Flexographic Printer
- Z021 – D-5 Rotary Chopper
- Z023 – D-5 Baggers
- Z066 – D-5 Inkjet Printer

2. Molded Pipe Factory Upgrade Project.

The project will consist of the installation of P200, P201, P202, and P203. As installation of the new emission units occur they will replace existing emission units P129 (A3 Furnace), P183 (Pipe RMS Thickness Sanders), and P189 (CMP and RSM End Trim Slitter). As such, P129, P183, and P189 will be permanently shutdown.

3. Binder Change Project

On September 7, 2010 OCIS was issued PTI P0106378 which allowed for the use of a new starched-based resin in the binder formulations utilized in the F-6 manufacturing line. In order to avoid exceeding PSD threshold P0106378 established a VOC synthetic minor limitation to limit the VOC emissions increase for the project to less than 39.0 tons.

**Table III:
Contemporaneous Increases/Decreases and
Shutdowns During 5 year Period**

Project	Averaging Period	Pollutant	2yr Average Actual (tpy)	Projected Actual (tpy)	Difference (tpy)
D-5 Shutdown	2006/2007	PM	131.1	0	-131.1
		PM10	131.1	0	-131.1
		PM2.5	113.1	0	-113.1
		VOC	37.0	0	-37.0
Molded Pipe Factory Upgrade	2007/2008	PM	10.7	0	-10.7
		PM10	10.7	0	-10.7
		PM2.5	6.0	0	-6.0
		VOC	0.6	0	-0.6
Binder Change	2005/2006	PM	90.7	90.7	0
		PM10	90.7	90.7	0
		PM2.5	80.7	80.7	0

		VOC	44.2	83.2	39.0
Total	-	PM	232.5	90.7	-141.8
		PM10	232.5	90.7	-141.8
		PM2.5	199.8	80.7	-119.1
		VOC	81.8	83.2	1.4

**Table IV:
Summary Table-
Sum of Table II and Table III**

	PE	PM10	PM2.5	VOC
Significant Emissions Increase	116.8	116.1	97.2	40.6
Contemporaneous Increases/Decreases	-141.8	-141.8	-119.1	1.4
Total Significant Net Emissions Increase	-25.0	-25.7	-21.9	42.0
Trigger Levels	25	15	10	40
Significant Net Emissions Increase?	No	No	No	Yes

Therefore, this project will result in a major modification because the NSR project causes a significant emission increase and a significant net emission increase. The permittee is proposing to accept synthetic minor limits for this project to avoid a major modification.

**Table V:
Synthetic Minor Limitations**

Emission Units (EU)	EU Description	Permit No.	VOC PTE (tpy)	
			Pre	Post
P130	A4 Forming	P0107520	20.7	39.5
P143	A5 Forming	P0107520	9.3	
P200	IPM	P0107269	12.1	
P025	A3 Conditioning Channel / Forehearth	01-08902	0.1	0.1
P133	CMP-1	01-5269	1.7	1.7
P134	CMP-2	01-5270	1.7	1.7
P135	CMP-3	01-5271	1.7	1.7
P142	CMP-4	01-5272	1.7	1.7
P177	Pipe Binder Prep	01-3483	0.0	0.0
P194	CMP-5	01-5682	5.9	5.9
P201	IPM Trim/Slitter	P0107269	0.0	0.0

P202	IPM Thicknes s Sanders	P0107269	0.0	0.0
P203	A3 Electric Furnace	P0107269	0.0	0.0
Total Potential Emissions			54.9	52.3
Total Baseline Emissions			14.3	14.3
Contemporaneous Increases/Decreases			1.4	1.4
Total Increase			42.0	39.4
Trigger Levels			40	40
Significant Net Emissions Increase AFTER Synthetic Minor Restrictions?			Yes	No

Therefore, this project will not result in a major modification because the NSR project does not cause a significant emissions increase.

This permit seeks to institute federally enforceable restrictions on the facility's new IPM (P200) and existing A4 and A5 forming sections (P130 and P143). The PTE for P200, P130, and P143 will be limited by a federally enforceable limitation on glass feed.

3. Facility Emissions and Attainment Status:

Licking County is considered to be in attainment for all criterion pollutants excluding PM2.5.

The Significant Modification evaluation in this permit determine that permitting actions proposed under P0107269 and P0107520 do not constitute a Major Modification as defined by OAC rule 3745-31-01(JJJ) when the synthetic minor restrictions are included. This permit action, specifies synthetic minor restrictions considered in this evaluation.

4. Source Emissions:

OCIS has proposed a new project that will replace the existing A3 Furnace (P129), Pipe RMS Thickness Sanders (P183), and CMP and RSM End Trim Slitter (P189). This activity is being permitted in P0107269 and will institute federally enforceable restrictions through this synthetic minor permit. This permit will institute federally enforceable restrictions on the facility's new IPM (P200) and existing A4 and A5 forming sections (P130 and P143). The PTE for P200, P130, and P143 will be limited by a federally enforceable limitation on glass feed.

5. Conclusion:

This project meets the definition of a Significant Modification, however the federally enforceable limitations in this permit will effectively restrict the emissions to levels below those which trigger a Significant Modification and non-attainment NSR for PM, PM10, PM2.5, and VOC.

6. Please provide additional notes or comments as necessary:

A Chapter 31 modification (P0107520) has been initiated in parallel with this permitting action to account for the changes to existing emission units affected by the installation of P200, P201,

P202, and P203. The Significant Modification Evaluation will be included in the write-up for that permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PM</u>	<u>44.8</u>
<u>PM10</u>	<u>44.8</u>
<u>PM 2.5</u>	<u>33.6</u>
<u>SO2</u>	<u>1.9</u>
<u>NOx</u>	<u>12.2</u>
<u>CO</u>	<u>35.8</u>
<u>VOC</u>	<u>34.9</u>

PUBLIC NOTICE PUBLIC HEARING
ISSUANCE OF DRAFT AIR POLLUTION PERMOT-TO-INSTALL
Owens Corning Insulating Systems, LLC

Issue Date: 2/10/2011
Facility ID: 0145020185
Facility Location: 400 Case Ave.
Newark, OH 43055-5893
Facility Description: Mineral Wool Manufacturing

Permit Number: P0107269
Permit Type: Initial Installation

Permit Description: Initial installation of an in-line pipe machine and an electric furnace needed to expand the capacity of the molded pipe insulation production operations at the Newark Plant. The permit includes federally enforceable limitations on volatile organic compounds.

Permit Number: P0107520
Permit Type: Chapter 31 mod

Permit Description: This Chapter 31 permit modification accommodates the installation of a new in-line pipe machine and all-electric furnace and establishes federally enforceable limitations on VOC emissions.

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). The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

A public hearing and information session on the draft air permits indicated above will be held on Tuesday, March 15, 2011 at 6:00PM, at the Licking County Library, Newark Branch, 101 W. Main St., Newark, OH 43055. A brief information session about the permit will be followed by the public hearing. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard. All interested persons are entitled to attend or be represented and give written or oral comments at the hearing.

All comments must be received by the end of the hearing on Tuesday, March 15, 2011. Comments received after this date will not be considered to be a part of the official record. Any written comments not delivered at the hearing, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Adam Novak, Ohio EPA – CDO, P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778.



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Owens Corning Insulating Systems, LLC**

Facility ID:	0145020185
Permit Number:	P0107269
Permit Type:	Initial Installation
Issued:	2/10/2011
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Owens Corning Insulating Systems, LLC

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Authorization

Facility ID: 0145020185
Facility Description: Mineral Wool
Application Number(s): A0040736
Permit Number: P0107269
Permit Description: Initial installation of an in-line pipe machine and an electric furnace needed to expand the capacity of the molded pipe insulation production operations at the Newark Plant. The permit includes federally enforceable limitations on volatile organic compounds.
Permit Type: Initial Installation
Permit Fee: \$1,350.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 2/10/2011
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Owens Corning Insulating Systems, LLC
400 CASE AVE.
NEWARK, OH 43055-5893

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107269
Permit Description: Initial installation of an in-line pipe machine and an electric furnace needed to expand the capacity of the molded pipe insulation production operations at the Newark Plant. The permit includes federally enforceable limitations on volatile organic compounds.

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

- Emissions Unit ID:** P200
- Company Equipment ID: IPM
- Superseded Permit Number:
- General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P203
- Company Equipment ID: New Pipe A-3 Furnace
- Superseded Permit Number:
- General Permit Category and Type: Not Applicable

Group Name: Pipe Penclone

Emissions Unit ID:	P201
Company Equipment ID:	New IPM Trim, Slitter, and Hammermill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P202
Company Equipment ID:	New IPM Thickness Sanders
Superseded Permit Number:	
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 Ohio EPA DAPC, Central 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, Central 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, Central 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, Central 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, Central 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, Central 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, Central 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 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

Draft Permit-to-Install

Owens Corning Insulating Systems, LLC

Permit Number: P0107269

Facility ID: 0145020185

Effective Date: To be entered upon final issuance

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. P200, IPM

Operations, Property and/or Equipment Description:

Inline pipe machine

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 3745-31-05(A)(3), as effective 11/30/01	Sulfur dioxide (SO ₂) emissions shall not exceed 0.41 pound per hour and 1.81 tons per year. See b)(2)a.
b.	ORC 3704.03(T)	Filterable and condensable particulate emissions (PE) shall not exceed 16.8 pounds per ton glass delivered to P143. Volatile organic compound emissions shall not exceed 5.5 pounds per ton bare glass delivered to P143. Carbon monoxide emissions shall not exceed 15.1 pounds per ton bare glass delivered to P143. Nitrogen oxides (NO _x) emissions shall not exceed 5.0 pounds per ton bare glass delivered to P143. See b)(2)a.
c.	OAC rule 3745-31-05(A)(a)(ii), as effective 12/1/06	See b)(2)b.
d.	OAC rule 3745-31-05(D) (federally enforceable limitation to avoid PSD)	Total volatile organic compound emissions from P130, P143, and P200 shall not exceed 39.5 tons per rolling 12-month summation.

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Owens Corning Insulating Systems, LLC

Permit Number: P0107269**Facility ID:** 0145020185**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See c)(4)
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide emissions shall not exceed 20.4 pounds per hour. [See b)(2)c] The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-21-07(G)(1)	Exempt; see b)(2)f and c)(2)-(3)
i.	40 CFR Part 60, Subpart PPP (40 CFR 60.680-60.685)	11.0 lb particulate matter per ton of glass pulled (i.e., delivered to P143) See b)(2)e
j.	40 CFR Part 60, Subpart A	General Provisions in 40 CFR 60.1-60.19
k.	40 CFR Part 63, Subpart NNN (40 CFR 63.1380-63.1399)	Exempt; See b)(2)d

(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 3745-31-05 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 pollutants 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 SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for SO₂ is less than 10 tons/yr.
- c. Once US EPA approves the December 1, 2006 version of 3745-31-05, then the requirements of OAC rule 3745-18-06(E) become effective.

d. This emissions unit is exempt from the requirements for 40 CFR Part 63, Subpart NNN since it is a component of a rotary spin wool fiberglass manufacturing line that produces a bonded, heavy-density wool fiberglass building insulation production and therefore does not meet the applicability requirement of 40 CFR 63.1380(a)(2).

e. In accordance with 40 CFR 60.682, on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain particulate matter in excess of 5.5 kg/Mg (11.0 lb/ton) of glass pulled (i.e., delivered to P143).

In accordance with 40 CFR 60.681, "manufacturing line" means the manufacturing equipment comprising the forming section, where molten glass is fiberized and a fiberglass mat is formed; the curing section, where the binder resin in the mat is thermally "set"; and the cooling section, where the mat is cooled.

f. Per OAC rule 3745-21-07(G)(9)(c), this emissions unit is exempt from the requirements of OAC 3745-21-07(G)(1) because this emissions unit utilizes a binder that is composed of only water and organic materials, has an organic materials content that does not exceed 20% and contains organic materials that are not photochemically reactive.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) The permittee shall employ only binders in this emissions unit that are composed of water and organic materials (with an organic materials content that does not exceed 20%) and the organic materials shall not be photochemically reactive.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

(3) The requirement that no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to this limitation shall be void.

(4) The maximum amount of bare glass feed to P130 and P143 combined shall not exceed the following, based upon a rolling, 12-month summation of the bare glass feed:

$$P_T = \frac{79,000 + EF_{P130} \times P_{143} + (EF_{P143} + EF_{IPM}) \times P_{P130}}{EF_{P130} + EF_{P143} + EF_{IPM}}$$

Where:

P_T = total tons bare glass feed to P130 and P143

EF_{P130} = VOC emission factor for P130, lb VOC/ton bare glass delivered to P130. Use 3.4 lb/ton or the value determined from the most recent stack test performed.

EF_{P143} = VOC emission factor for P143, lb VOC/ton bare glass delivered to P143. Use 4.3 lb/ton or the value determined from the most recent stack test performed.

EF_{IPM} = VOC emission factor for P200, lb VOC/ton bare glass delivered to P143. Use 5.5 lb/ton or the value determined from the most recent stack test performed.

P_{P130} = tons bare glass delivered to A-4 Forming Section (P130)

P_{P143} = tons bare glass delivered to A-5 Forming Section (P143)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. Tons of bare glass delivered to P130;
- b. Tons of bare glass delivered to P143;
- c. Total combined tons of bare glass delivered to P130 and P143;
- d. Rolling, 12-month summation of the tons of bare glass delivered to P130 and P143;
- e. VOC emissions from P130, tons/month, calculated as follows: (3.4 lb/ton glass delivered to P130 (or the emission factor determined from the most recent stack test)) * a / 2000 lb/ton,
- f. VOC emissions from P143, tons/month, calculated as follows: (4.3 lb/ton glass delivered to P143 (or the emission factor determined from the most recent stack test)) * b / 2000 lb/ton,
- g. VOC emissions from P200, tons/month, calculated as follows: (5.5 lb/ton glass delivered to P143 (or the emission factor determined from the most recent stack test)) * b / 2000 lb/ton,
- h. Total VOC emissions from P130, P143, and P200, tons/month, calculated as follows: e + f + g; and
- i. Rolling, 12-month summation of VOC emissions from P130, P143, and P200.

(2) 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. 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (3) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) For each day during which the permittee utilizes a binder with an organic materials content greater than 20% or which contains organic materials that are photochemically reactive, the permittee shall maintain a record of the type and quantity of binder utilized in this emissions unit.
- (5) 40 CFR Part 60, Subpart PPP (40 CFR 60.680-685) as applicable per b)(2)e.

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 deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit deviation (excursion) reports that identify each day during which the permittee utilizes a binder with an organic materials content greater than 20% or which contains organic materials that are photochemically reactive. Each report shall be submitted within 30 days after the deviation occurs.

- (4) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month bare glass delivery limitation; and
 - b. all exceedance of the rolling, 12-month VOC emission limitation;

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

- (6) See 40 CFR Part 60, Subpart PPP (40 CFR 60.680-685) as applicable per b)(2)e.

f) **Testing Requirements**

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

- a. **Emission Limitation:**

Filterable and condensable particulate emissions shall not exceed 16.8 pounds per ton bare glass delivered to P143.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for P200 in accordance with the following requirements:

- i. The emission testing shall be conducted no later than 180 days after commencing operation.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5E and 40 CFR Part 51, Appendix M, Method 202. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

b. Emission Limitation:

Particulate matter emissions shall not exceed 11.0 lb/ton glass pulled (i.e., bare glass delivered to P143).

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for P200 in accordance with the following requirements:

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of the IPM.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5E. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.
- v. In accordance with 40 CFR 60.685, testing shall be conducted as follows:
 - (a) In conducting the performance tests required in 60.8, the owner/operator shall use as reference methods and procedures the test methods in Appendix A of this part or other methods and procedures as specified in this section, except as provided in 60.8(b).
 - (b) The owner/operator shall conduct performance tests while the product with the highest loss on ignition (LOI) expected to be produced by the affected facility is being manufactured.
 - (c) The owner/operator shall determine compliance with the particulate matter standard in 60.682 as follows:
 - (i) The emission rate (E) of particulate matter shall be computed for each run using the following equation:

$$E = (C_t Q_{sd}) / (P_{avg} K)$$

Where:

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

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

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

P_{avg} = average glass pull rate, Mg/hr (ton/hr)

K = 1,000 g/kg (7,000 gr/lb)

(ii) Method 5E shall be used to determine the particulate matter concentration (C_t) and the volumetric flow rate (Q_{sd}) of the effluent gas. The sampling time and sample volume shall be at least 120 minutes and 2.55 dscm (90.1 dscf).

(iii) The average glass pull rate (P_{avg}) for the manufacturing line shall be the arithmetic average of three glass pull rate (P_i) determinations taken at intervals of at least 30 minutes during each run.

The individual glass pull rates (P_i) shall be computed using the following equation

$$P_i = K'L_sW_mM[1.0-(LOI/100)]$$

Where:

P_i = glass pull rate at interval "i", Mg/hr (ton/hr)

L_s = line speed, m/min (ft/min)

W_m = trimmed mat width, m (ft)

M = mat gram weight, g/m² (lb/ft²)

LOI = loss on ignition, weight percent

K' = conversion factor, 6x10⁻⁵ (min-Mg)/(hr-g) [3x10⁻² (min-ton)/(hr-lb)]

1) ASTM D2584-68 (Reapproved 1985) or 94 (incorporated by reference-see 40 CFR 60.17), shall be used to determine the LOI for each run.

2) Line speed (L_s), trimmed mat width (W_m), and mat gram weight (M) shall be determined for each run

from the process information or from direct measurements.

c. Emission Limitation:

NO_x emissions shall not exceed 5.0 lb/ton bare glass delivered to P143.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for P200 in accordance with the following requirements:

- i. The emission testing shall be conducted no later than 180 days after commencing operation.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO_x.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

d. Emission Limitation:

CO emissions shall not exceed 15.1 lb/ton bare glass delivered to P143.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for P200 in accordance with the following requirements:

- i. The emission testing shall be conducted no later than 180 days after commencing operation.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for CO.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

e. Emission Limitation:

Visible emissions shall not exceed 20% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

SO₂ emissions shall not exceed 0.41 pound per hour and 1.81 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO₂ in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Compliance may be established by multiplying the hourly emission limitation by 8760 hours of operation per year and dividing by 2000 to convert to ton(s). Therefore, compliance with the annual emission limitation shall be assumed if compliance with the hourly emission limitation is maintained.

g. Emission Limitation:

VOC emissions shall not exceed 5.5 lb/ton bare glass delivered to P143.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for P200 in accordance with the following requirements:

- i. The emission testing shall be conducted no later than 180 days after commencing operation.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC.
- iii. Compliance with the hourly limitation may be determined by summing the hourly stack test results for formaldehyde (using 40 CFR Part 63, Appendix A, Method 316 or 318), methanol (using 40 CFR Part 63, Appendix A, Method 308 or 318), and phenol (using 40 CFR Part 63, Appendix A, Method 318 or 40 CFR Part 60, Appendix A, Method 18) with the hourly VOC emissions from natural gas combustion for this emissions unit. Hourly VOC emissions from natural gas combustion are derived by multiplying the burner ratings of 9.9 (i.e., 6.6 for the oven and 3.3 for the exhaust) MMBtu per hour by the AP-42 emission factor for natural gas (5.5 lbs VOC/mmscf) from Table 1.4-1, 7/98, and divide by the conversion

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factor of 1020 MMBtu per mmscf. 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 Ohio EPA, Central District Office.

h. Emission Limitation:

Total combined volatile organic compound emissions from P130, P143, and P200 shall not exceed 39.5 tons per rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(1)i.

- (2) 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 Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Central District Office 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.

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 Central District Office 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 Central District Office.

g) Miscellaneous Requirements

- (1) None.

2. P203 Pipe A-3 Furnace

Operations, Property and/or Equipment Description:

Electric A-3 Furnace

- 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 3745-31-05(A)(3), as effective 11/30/01	Sulfur dioxide emissions shall not exceed 0.02 pound per hour and 0.09 ton per year. Nitrogen oxide emissions shall not exceed 0.30 pound per hour and 1.31 tons per year. Carbon monoxide emissions shall not exceed 0.64 pound per hour and 2.80 tons per year. The requirements of this rule also include compliance with the requirements of 40 CFR 63, Subpart NNN. See b)(2)a and c)(1)-(2) below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide emissions shall not exceed 55.4 pounds per hour. [See b)(2)c] [The emission limitation specified by this

Draft Permit-to-Install

Owens Corning Insulating Systems, LLC

Permit Number: P0107269

Facility ID: 0145020185

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).]
f.	40 CFR Part 63, Subpart NNN (40 CFR 63.1380-63.1399)	0.25 kg of particulate matter per Mg (0.5 lb PM/ton) of glass pulled See b)(2)d and c)(3)-(4)
g.	40 CFR Part 63, Subpart A (40 CFR 63.1380(d))	Table 1 to Subpart NNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNN shows which parts of the General Provisions in 40 CFR 63.1-63.15 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 3745-31-05 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 pollutants 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.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, NO_x, and CO emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, NO_x, and CO is less than 10 tons/yr.
- c. Once US EPA approves the December 1, 2006 version of 3745-31-05, then the requirements of OAC rule 3745-18-06(E) become effective.
- d. In accordance with 40 CFR Part 63.1382(a)(1), on and after the date the initial performance test is completed, the permittee shall not discharge or cause to be discharge into the atmosphere in excess of 0.5 pound PM per ton of glass pulled for emissions unit P203.

c) Operational Restrictions

- (1) The permittee shall vent all the emissions from this emissions unit through a baghouse that shall operate during any operation of this emissions unit.

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- (2) The permittee shall operate the affected control equipment (baghouse) according to the requirements in 40 CFR 63.1382(b)(1)(i) and (ii) for a bag leak detection system.
- (3) In accordance with 40 CFR Part 63.1382(b)(5)(i), the permittee must initiate corrective action within 1 hour when the average glass pull rate of any 4-hour block period for glass melting furnaces equipped with continuous glass pull rate monitors exceeds the average glass pull rate established during the performance test as specified in section 63.1384, by greater than 20 percent and complete corrective actions in a timely manner according to the procedures in the operations, maintenance, and monitoring plan.

In accordance with 40 CFR Part 63.1382(b)(5)(ii), the permittee must implement a QIP consistent with the compliance assurance monitoring provisions of 40 CFR part 64, Subpart D when the glass pull rate exceeds, by more than 20 percent, the average glass pull rate established during the performance test as specified in section 63.1384 for more than 5 percent of the total operating time in a 6-month block reporting period.

In accordance with 40 CFR Part 63.1382(b)(5)(iii), the permittee must operate each glass-melting furnace such that the glass pull rate does not exceed, by more than 20 percent, the average glass pull rate established during the performance test as specified in section 63.1384 for more than 10 percent of the total operating time in a 6-month block reporting period.

- (4) See 40 CFR Part 63, Subpart NNN (40 CFR 63.1380-63.1399), as applicable per b)(2)d.

d) Monitoring and/or Recordkeeping Requirements

- (1) In accordance with 40 CFR Part 63.1383(b), where a baghouse is used to control PM emissions from a glass-melting furnace, the permittee shall install, calibrate, maintain and continuously operate a bag leak detection system as specified in 63.1383(b)(1)(i)-(vii).
- (2) In accordance with 40 CFR Part 63.1383(f)(2), the permittee, on any new glass-melting furnace, must install, calibrate, and maintain a continuous glass pull rate monitor that monitors and records on an hourly basis the glass pull rate.
- (3) In accordance with 40 CFR Part 63.1386(d)(2)(ix), the permittee shall record the glass pull rate, including any period when the pull rate exceeded the average pull rate established during the most recent emission test that demonstrated compliance with the particulate emission limitation by more than 20 percent, the date and time of the exceedance, when corrective actions were initiated, the cause of the exceedance, an explanation of the corrective actions taken, and when the cause of the exceedance was corrected.
- (4) In accordance with 40 CFR Part 63.1386(d)(2)(i), the permittee shall maintain records of any bag leak detection system alarms, including the date and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.
- (5) In accordance with 40 CFR Part 63.1383(a), on and after the date on which the performance test required to be conducted by sections 63.7 and 63.1384 is completed, the permittee must monitor all affected control equipment and processes according to the following requirements:

- a. The permittee of each wool fiberglass manufacturing facility must prepare for each glass-melting furnace a written operations, maintenance, and monitoring plan. The plan must be submitted to the Administrator for review and approval as part of the application for a part 70 permit. The plan must include the following information:
 - i. Procedures for the proper operation and maintenance of process modifications and add-on control devices used to meet the emission limits in section 63.1382;
 - ii. Procedures for the proper operation and maintenance of monitoring devices used to determine compliance, including quarterly calibration and certification of accuracy of each monitoring device according to the manufacturer's instructions; and
 - iii. Corrective actions to be taken when process parameters or add-on control device parameters deviate from the limit(s) established during initial performance tests.
- (6) In accordance with 40 CFR Part 63.1383(m), for all control device and process operating parameters measured during the initial performance tests, the permittee of the identified glass-melting furnaces subject to this subpart may change the limits established during the initial performance tests if additional performance testing is conducted to verify that, at the new control device or process parameter levels, they comply with the applicable emission limits in section 63.1382. The permittee shall conduct all additional performance tests according to the procedures in this Part 63, Subpart A and in Section 63.1384.
- (7) The permittee shall develop a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process modifications and control systems used to comply with the standards. In addition to the information required in 63.6(e)(3), the plan shall include the information specified in 40 CFR 63.1386(c)(1)(i)-(iii).
- (8) The permittee shall maintain records of each event as required by 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 63.10(e)(3)(iv).
- (9) 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. 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

(10) See 40 CFR Part 63, Subpart NNN (40 CFR 63.1380-63.1399), as applicable per b)(2)d.

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) In accordance with 40 CFR Part 63.1386(e), the permittee shall submit semiannual reports if measured emissions are in excess of all applicable standards or monitored parameters deviate from the levels established during the performance test. Each report shall contain the information specified in 40 CFR 63.10(c) as well as the additional records required by the record keeping requirements of 63.1386(d), as described above in Section d) of this permit. When no deviations have occurred, the permittee shall submit a report stating that no excess emissions occurred during the reporting period.
- (3) See 40 CFR Part 63, Subpart NNN (40 CFR 63.1380-63.1399) as applicable per b)(2)d.
- (4) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate matter emissions shall not exceed 0.5 pound of PM per ton of glass pulled.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for P203 in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months of startup.
- ii. The emission testing shall be conducted to demonstrate compliance with the lb/hr particulate emission limitation and emission standard for particulate from 40 CFR Part 63, Subpart NNN.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

b. Emission Limitation:

NO_x emissions shall not exceed 0.30 pound per hour and 1.31 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for NO_x in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Compliance may be established by multiplying the hourly emission limitation by 8760 hours of operation per year and dividing by 2000 to convert to ton(s). Therefore, compliance with the annual emission limitation shall be assumed if compliance with the hourly emission limitation is maintained.

c. Emission Limitation:

CO emissions shall not exceed 0.64 pound per hour and 2.80 ton per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for CO in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Compliance may be established by multiplying the hourly emission limitation by 8760 hours of operation per year and dividing by 2000 to convert to ton(s). Therefore, compliance with the annual emission limitation shall be assumed if compliance with the hourly emission limitation is maintained.

d. Emission Limitation:

Visible emissions shall not exceed 20% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

SO₂ emissions shall not exceed 0.02 pound per hour and 0.09 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO₂ in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Compliance may be established by multiplying the hourly emission limitation by 8760 hours of operation per year and dividing by 2000 to convert to ton(s). Therefore, compliance with the annual emission limitation shall be assumed if compliance with the hourly emission limitation is maintained.

- (2) 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 Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Central District Office 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.

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 Central District Office 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 Central District Office.

- g) Miscellaneous Requirements
 - (1) None.

3. Emissions Unit Group - Pipe Penclone: P201, P202,

EU ID	Operations, Property and/or Equipment Description
P201	IPM Trim, Slitter, and Hammermill vented to the penclone
P202	IPM Thickness Sander vented to the penclone

- 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.
 - (2) 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 3745-31-05(A)(3), as effective 11/30/01	Filterable particulate emissions shall not exceed 0.8 lb/hr and 3.38 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 2.73 lbs/hr based on Table I from each P201 and P202. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
 - a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/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.

Permit to Install P0107269 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

- i. filterable particulate emissions shall not exceed 0.8 lb/hr and 3.38 tons per year.

- c. The hourly and annual filterable particulate emission limitations for this emissions unit were established to reflect the potentials to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

c) Operational Restrictions

- (1) None

d) Monitoring and/or Recordkeeping Requirements

- (1) None

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.

f) Testing Requirements

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

- a. Emission Limitation:

Filterable particulate emissions shall not exceed 0.8 lb/hr and 3.38 ton/yr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for PE in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.