☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **03-16251**

A. Source Description

Certainteed Corporation manufactures asphalt roofing tiles on two complete production lines at it's Avery facility. The sources included in this PTI are the line #2 asphalt coater (P178), and the line #2 sealant applicator (P179). These sources are being replaced in order to allow the asphalt roofing product produced on line #2 to be made in metric units, instead of English units.

B. Facility Emissions and Attainment Status

Certainteed is a currently a major PSD facility for VOC emissions, however, it is not known when the facility became major (before or after the installation of line #2). In order to eliminate any possible PSD issues associated with this project, the facility has requested a restriction in asphalt material usage to limit VOC emissions below the 40 tons per year significance level. The Certainteed facility is located in Erie County which is in attainment for all pollutants.

C. Source Emissions

This permit is being processed with a synthetic minor limit of 132,000 tons of asphalt coating use per year, in order to limit the VOC emissions to less than 40 tons. VOC emissions will be limited to 38.69 tons/year. Other emissions limits include 2.03 tons PE/year, 10.21 tons CO/year, and 2.08 tons SO2/year. The coater and sealant applicator are controlled by a coalescing filter and a Mini-HEAF, respectively, for capture of particulate emissions. The company is claiming a 98% control efficiency for both of these particulate control devices.

D. Conclusion

This PTI will limit VOC emissions through an asphalt material usage restriction to below the PSD significance threshold of 40 tons per year VOC.

OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
ERIE COUNTY
Application No: 03-16251
Fac ID: 0322000017

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
LLLLL	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/5/2004

CertainTeed Corporation - Avery Facility
Greg Frost
11519 US Route 250N
Milan, OH 44846

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NWDO** **Toledo Met Area Council of Governments** **MI**

ERIE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-16251** FOR AN AIR CONTAMINANT SOURCE FOR
CertainTeed Corporation - Avery Facility

On 11/5/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **CertainTeed Corporation - Avery Facility**, located at **11519 State Route 250N, Milan**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16251:

Replace coater and sealant application to convert to metric.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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

DRAFT PERMIT TO INSTALL 03-16251

Application Number:	03-16251
Facility ID:	0322000017
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	CertainTeed Corporation - Avery Facility
Person to Contact:	Greg Frost
Address:	11519 US Route 250N Milan, OH 44846

Location of proposed air contaminant source(s) [emissions unit(s)]:
11519 State Route 250N
Milan, Ohio

Description of proposed emissions unit(s):
Replace coater and sealant application to convert to metric.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the

previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. 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 appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	38.69
PE	2.03
CO	10.21
SO2	2.08

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

This facility is subject to 40 CFR Part 63, Subpart LLLLL, National Emission Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart LLLLL. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 7 of 40 CFR Part 63, Subpart LLLLL. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart LLLLL and Subpart A.

The permittee can avoid the applicability and requirements of the MACT rule for asphalt roofing manufacturers, if the appropriate synthetic minor permit(s) are obtained which limit the potential to emit at the facility for hazardous air pollutants (HAPs) to less than 10 tons per year for an individual HAP or 25 tons per year for combined HAPs. The appropriate synthetic minor permit(s) must be obtained prior to May 1, 2006.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P178 - line 2 coater with coalescing filter	OAC rule 3745-31-05(A)(3)	12.68 lbs organic compounds (OC)/hour 0.61 lbs particulate emissions (PE)/hour; 1.85 tons PE/year 3.35 lbs carbon monoxide (CO)/hour; 10.16 tons CO/year 0.67 lbs sulfur dioxide (SO2)/hour; 2.03 tons SO2/year See A.I.2.b
	OAC rule 3745-31-05(C)	38.69 tons OC/rolling 12-month period for OC emissions from emissions units P178 and P179, combined (see A.I.2.a)
	OAC 3745-17-07(A)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC 37-45-21-07(G)	See A.II.3
	OAC 3745-21-08(B)	See A.I.2.d
	OAC 3745-17-11(B)	See A.I.2.c
	OAC 3745-18-06(E)	See A.I.2.c
	40 CFR Part 63, Subpart LLLLL	See section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

2. Additional Terms and Conditions

2.a The emissions of OC from emission units P178 and P179 combined shall not exceed 38.69 tons per rolling twelve month period based on an asphalt coating usage restriction (See A.II.1).

The 38.69 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

2.b Best Available Technology (BAT) control requirements for this emissions unit has been determined to be use of a coalescing filter (mist eliminator) with a control efficiency for 98% for controlling PE.

2.c The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.d The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

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

II. Operational Restrictions

1. The maximum annual asphalt coating usage for emission units P178 and P179 combined shall not exceed 132,000 tons, based upon a rolling 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the usage levels (for emission units P178 and P179 combined) specified in the following table:

MONTH(s)	MAXIMUM ALLOWABLE CUMULATIVE ASPHALT COATING USAGE (TONS)
1	33,000
1-2	42,000
1-3	51,000

1-4	60,000
1-5	69,000
1-6	78,000
1-7	87,000
1-8	96,000
1-9	105,000
1-10	114,000
1-11	123,000
1-12	132,000

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual production limitation shall be based upon a rolling, 12 month summation of the monthly usage rates.

2. The pressure drop across the coalescing filter shall be maintained within the range of 2 - 8 inches of water while emissions unit P178 is in operation.

3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emission units P178 and P179 combined:

   a. asphalt coating usage, in tons;

   b. during the first 12 calendar months of operation, the cumulative asphalt coating usage, in tons;

   c. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the asphalt coating usage, in tons;

   d. the calculated monthly emission rate for OC using the following equation:

      OC emissions in tons = (asphalt coating usage) x (company supplied emission factor for P178) x (1 tons/2000 lbs) + (asphalt coating usage) x (company supplied emission factor for P179) x (1 tons/2000 lbs) = (A.III.1.a) x (0.582 lb OC/ton asphalt used) x (1 ton/2000 lbs) + (A.III.1.a) x (0.00424 lb OC/ton asphalt used) x (1 ton/2000 lbs);

   e. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for OC, in tons.

2. The permittee shall collect and record the following information each month for emissions unit P178:

   a. the company identification for each asphalt coating material employed;

b. documentation of whether or not each asphalt coating material employed is photochemically reactive material;

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following::

   a. the rolling, 12-month asphalt coating usage limitation;

   b. the rolling, 12-month OC emissions; and

   c. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tons of asphalt coating usage.

   The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each coalescing filter (mist eliminator) did not comply with the allowable range specified above. The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of photochemically reactive asphalt coating materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

V. Testing Requirements

1. 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 90 days after initial startup of the emissions unit.

   b. The emission testing shall be conducted to demonstrate compliance with the following:

      i. the mass emission limitation of 12.68 lbs OC/hour

      ii. the mass emission limitation of 0.61 lbs PE/hour

      ii. the 98% control efficiency for PE for the coalescing filter (mist eliminator).

      iii. The emission testing shall also be conducted to verify the company supplied emission factors of:

(a) 0.582 lbs OC/ton of asphalt coating used.

(b) 1.4 lbs PE/ton of asphalt coating used.

c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations and verify emission factor:

i. Methods 1 - 4 of 40 CFR Part 60, Appendix A

ii. for PE - Method 5 of 40 CFR Part 60, Appendix A

iii. for OC- Method 18, 25, or 25A of CFR Part 60, Appendix A.

iv. The control efficiency for PE (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in using Method 5 of 40 CFR Part 60, Appendix A.

d. The tests shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Division of Air Pollution Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's air agency's refusal to accept the results of the emissions tests.

e. Personnel from the Ohio EPA District Office's air agency shall be permitted to witness the test, 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 unit and/or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Division of Air Pollution Control within 30 days following completion of the tests.

2. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:
12.68 lbs organic compounds (OC)/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with the pounds per hour limitation through the testing requirements contained in section A.V.1.

b. Emission Limitation:
0.61 lbs PE/hour; 1.85 tons PE/year

Applicable Compliance Method:
The permittee shall demonstrate compliance with the pounds per hour limitation and control efficiency through the testing requirements contained in section A.V.1.

The tons/year limitation was established by multiplying the asphalt usage limitation of 132,000 tons/yr, a company supplied emission factor of 1.4 lbs PE/ton asphalt used, a conversion factor of 1 ton/2000 lbs and applying a control efficiency of 98% for use of a coalescing filter. Therefore, provided compliance is shown with the control efficiency and the annual asphalt usage restriction, and verfication of the company supplied emission factor, compliance with the tons/year limitation will be assumed.

c. Emission Limitation:
3.35 lbs carbon monoxide (CO)/hour; 10.16 tons CO/year

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb/hr limitation by multiplying a maximum asphalt coating usage rate of 21.78 tons/hr by a company supplied emission factor of 0.154 lbs CO/ton asphalt used. If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A - Methods 1-4 and 10.

The tons/year limitation was established by multiplying the asphalt usage limitation of 132,000 tons/yr, a company supplied emission factor of 0.154 lbs CO/ton asphalt used, and a conversion factor of 1 ton/2000 lbs. Therefore provided compliance is shown with the annual asphalt usage restriction compliance with the tons/year limitation will be assumed.

d. Emission Limitation:
0.67 lbs sulfur dioxide (SO2)/hour; 2.03 tons SO2/year

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb/hr limitation by multiplying a maximum asphalt coating usage rate of 21.78 tons/hr by a company supplied emission factor of 0.0307 lbs SO2/ton asphalt used. If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A - Methods 1-4 and 6.

The tons/year limitation was established by multiplying the asphalt usage limitation of 132,000 tons/yr, a company supplied emission factor of 0.0307 lbs SO2/ton asphalt used, and a conversion factor of 1 ton/2000 lbs. Therefore provided compliance is shown with the annual asphalt usage restriction compliance with the tons/year limitation will be assumed.

e. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B).

f. Emission Limitation:
38.69 tons OC/rolling 12-month period for OC emissions from emissions units P178 and P179, combined.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the rolling 12-month OC emissions limit by the record keeping requirement in section A.III.1.

g. Emission Limitation:
The maximum annual asphalt coating usage for emission units P178 and P179 combined shall not exceed 132,000 tons, based upon a rolling 12-month summation of the monthly usage rates.

h. Applicable Compliance Method:
The permittee shall demonstrate compliance with the rolling 12-month OC emissions limit by the record keeping requirement in section A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P178 - line 2 coater with coalescing filter		

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P179 - line 2 sealant applicator, with mini-HEAF filter	OAC rule 3745-31-05(A)(3)	0.09 lbs organic compounds (OC)/hour
		0.06 lbs particulate emissions (PE)/hour; 0.18 tons PE/year
		0.016 lbs carbon monoxide (CO)/hour; 0.05 tons CO/year
		0.016 lbs sulfur dioxide (SO2)/hour; 0.05 tons SO2/year
		See A.I.2.b
	OAC 3745-31-05(C)	38.69 tons OC/rolling 12-month period for OC emissions from emissions units P178 and P179, combined (see A.I.2.a)
	OAC 3745-17-07(A)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC 37-45-21-07(G)	See A.II.3
	OAC 3745-21-08(B)	See A.I.2.d
	OAC 3745-17-11(B)	See A.I.2.c
	OAC 3745-18-06(E)	See A.I.2.c
	40 CFR Part 63, Subpart LLLLL	See section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

2. Additional Terms and Conditions

2.a The emissions of OC from emission units P178 and P179 combined shall not exceed 38.69 tons per rolling twelve month period based on an asphalt coating usage restriction (See A.II.1).

The 38.69 tons of OC per year is a federally enforceable limitation established for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

2.b Best Available Technology (BAT) control requirements for this emissions unit has been determined to be use of a mini-HEAF filter with a control efficiency for 98% for controlling PE.

2.c The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.d The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

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

II. Operational Restrictions

1. The maximum annual asphalt coating usage for emission units P178 and P179 combined shall not exceed 132,000 tons, based upon a rolling 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the usage levels (for emission units P178 and P179 combined) specified in the following table:

MONTH(s)	MAXIMUM ALLOWABLE CUMULATIVE ASPHALT COATING USAGE (TONS)
1	33,000
1-2	42,000
1-3	51,000

1-4	60,000
1-5	69,000
1-6	78,000
1-7	87,000
1-8	96,000
1-9	105,000
1-10	114,000
1-11	123,000
1-12	132,000

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual production limitation shall be based upon a rolling, 12 month summation of the monthly usage rates.

2. The pressure drop across the mini-HEAF shall be maintained within the range of 28 - 38 inches of water while emissions unit P179 is in operation, except during periods of start-up.

3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emission units P178 and P179 combined:

   a. asphalt coating usage, in tons;

   b. during the first 12 calendar months of operation, the cumulative asphalt coating usage, in tons;

   c. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the asphalt coating usage, in tons;

   d. the calculated monthly emission rate for OC using the following equation:

      OC emissions in tons = (asphalt coating usage) x (company supplied emission factor for P178) x (1 tons/2000 lbs) + (asphalt coating usage) x (company supplied emission factor for P179) x (1 tons/2000 lbs) = (A.III.1.a) x (0.582 lb OC/ton asphalt used) x (1 ton/2000 lbs) + (A.III.1.a) x (0.00424 lb OC/ton asphalt used) x (1 ton/2000 lbs);

   e. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for OC, in tons.

2. The permittee shall collect and record the following information each month for emissions unit P179:

   a. the company identification for each asphalt coating material employed;

b. documentation of whether or not each asphalt coating material employed is photochemically reactive material;

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:

   a. the rolling, 12-month asphalt coating usage limitation;

   b. the rolling, 12-month OC emissions; and

   c. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative tons of asphalt coating usage.

   The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the mini HEAF filter did not comply with the allowable range specified above. The permittee shall submit these deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of photochemically reactive asphalt coating materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

V. Testing Requirements

1. 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 90 days after initial startup of the emissions unit.

   b. The emission testing shall be conducted to demonstrate compliance with the following:

      i. the mass emission limitation of 0.09 lbs OC/hour

      ii. The emission testing shall also be conducted to verify the company supplied emission factors of 0.00424 lbs OC/ton of asphalt coating used.

   c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations and verify emission factor:

i. Methods 1 - 4 of 40 CFR Part 60, Appendix A

ii. for OC- Method 18, 25, or 25A of CFR Part 60, Appendix A.

d. The tests shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Division of Air Pollution Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's air agency's refusal to accept the results of the emissions tests.

e. Personnel from the Ohio EPA District Office's air agency shall be permitted to witness the test, 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 unit and/or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Division of Air Pollution Control within 30 days following completion of the tests.

2. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:
0.09 lbs organic compounds (OC)/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with the pounds per hour limitation through the testing requirements contained in section A.V.1.

b. Emission Limitation:
0.06 lbs PE/hour; 0.18 tons PE/year

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb/hr limitation by multiplying a maximum asphalt coating usage rate of 21.78 tons/hr by a company supplied emission factor of 0.14 lbs PE/ton asphalt used and applying a control efficiency of 98% for use of a mini HEAF filter. . If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A - Methods 1-5.

The tons/year limitation was established by multiplying the asphalt usage limitation of 132,000 tons/yr, a company supplied emission factor of 0.14 lbs PE/ton asphalt used, a conversion factor of 1 ton/2000 lbs and applying a control efficiency of 98% for use of a

mini HEAF filter. Therefore, provided compliance is shown with the annual asphalt usage restriction, compliance with the tons/year limitation will be assumed.

c. Emission Limitation:
0.016 lbs carbon monoxide (CO)/hour; 0.05 tons CO/year

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb/hr limitation by multiplying a maximum asphalt coating usage rate of 21.78 tons/hr by a company supplied emission factor of 0.000723 lbs CO/ton asphalt used. If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A - Methods 1-4 and 10.

The tons/year limitation was established by multiplying the asphalt usage limitation of 132,000 tons/yr, a company supplied emission factor of 0.000723 lbs CO/ton asphalt used, and a conversion factor of 1 ton/2000 lbs. Therefore provided compliance is shown with the annual asphalt usage restriction compliance with the tons/year limitation will be assumed.

d. Emission Limitation:
0.016 lbs sulfur dioxide (SO2)/hour; 0.05 tons SO2/year

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb/hr limitation by multiplying a maximum asphalt coating usage rate of 21.78 tons/hr by a company supplied emission factor of 0.000723 lbs SO2/ton asphalt used. If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A - Methods 1-4 and 6.

The tons/year limitation was established by multiplying the asphalt usage limitation of 132,000 tons/yr, a company supplied emission factor of 0.000723 lbs SO2/ton asphalt used, and a conversion factor of 1 ton/2000 lbs. Therefore provided compliance is shown with the annual asphalt usage restriction compliance with the tons/year limitation will be assumed.

e. Emission Limitation:
Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B).

f. Emission Limitation:
38.69 tons OC/rolling 12-month period for OC emissions from emissions units P178 and P179, combined.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the rolling 12-month OC emissions limit by the record keeping requirement in section A.III.1.

g. Emission Limitation:
The maximum annual asphalt coating usage for emission units P178 and P179 combined shall not exceed 132,000 tons, based upon a rolling 12-month summation of the monthly usage rates.

h. Applicable Compliance Method:
The permittee shall demonstrate compliance with the rolling 12-month OC emissions limit by the record keeping requirement in section A.III.1.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P179 - line 2 sealant applicator, with mini-HEAF filter		

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.