Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

8/30/2011

Certified Mail

Facility ID: 1483040201
Permit Number: P0107344
County: Warren

Rod Mamula
Atlas Roofing Corporation, Franklin Roofing Facility
675 Oxford Road
Franklin, OH 45005

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Western Star. A copy of the public notice, the Statement of Basis, 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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
HCDOES; Indiana; Kentucky

Warren County

PUBLIC NOTICE
Issuance of Draft Air Pollution Title V Permit
Atlas Roofing Corporation, Franklin Roofing Facility

Issue Date: 8/30/2011
Permit Number: P0107344
Permit Type: Renewal
Permit Description: Renewal Title V Permit for an asphalt roofing shingle production facility which includes several natural gas and no. 2 fuel oil boilers and heaters, a couple of cold cleaners operations, several storage tanks containing both no. 2 fuel oil and asphalt, an asphalt shingle coating line, a saturated felt machine line, and a couple of flux asphalt blow still operations.
Facility ID: 1483040201
Facility Location: Atlas Roofing Corporation, Franklin Roofing Facility
675 Oxford Road,
Franklin, OH 45005
Facility Description: Asphalt Shingle and Coating Materials Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control Title V operating permit for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Alberta Mellon at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.ohio.gov/dapc

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1483040201
Facility Name:	Atlas Roofing Corporation, Franklin Roofing Facility
Facility Description:	Franklin Roofing Facility (Asphalt Roofing Shingle Production)
Facility Address:	675 Oxford Road, Franklin, OH 45005
Permit #:	P0107344, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☐ Volatile Organic Compounds ☐ Nitrogen Oxides

X Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants

☐ Maximum Available Control Technology Standard(s)

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any common control issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if	P001, P002, P902 – PTI 14-05396 rqts added; Chpt 31 PE/PM10 and VOC emission limit increases

applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	T008 – PTI P0105995 rqts added; new emissions unit PE/PM10 and VOC emission limits P004, P005, T006, T007 – PTI P0105996 rqts added; Chpt 31 PE/PM10 and VOC emission limit increases. T009 – PTI P0106142 rqts added; new emissions unit PE/PM10 and VOC emission limits Asphalt Roofing Area Source MACT/GACT added; 40 CFR Part 63, Subpart AAAAAAA

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	77-03(A)		Listing of Insignificant emission units
B.3.		40 CFR Part 63, Subpart AAAAAAA	Asphalt Roofing Area Source MACT/GACT for P001, P002, P004, P005

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P001	1.25 lbs. of VOC per hour	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	Y	N	This emissions unit is not subject to CAM because this emissions unit's emission standard is not controlled. ET – Emission testing for VOC is required.

P001	0.22 lb. of PE/PM10 per hour	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	Y	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). See B.3 (controls PE), Table 2 of B.3 above. ET – Emission testing for PE/PM10 is required.
P001	5.52 TPY VOC	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is not subject to CAM because this emissions unit's emission standard is not controlled. Annual limit established at controlled PTE. Compliance with the annual limit is demonstrated if compliance with the short-term limit is demonstrated.
P001	0.96 TPY PE/PM10	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). See B.3 (controls PE), Table 2 of B.3 above. Annual limit established at controlled PTE. Compliance with the annual limit is demonstrated if compliance with the short-term limit is demonstrated.
P001	20% VEs	17-07(A)(1)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). See B.3 (controls PE), Table 2 of B.3 above. M, R, Rp – VE checks required.
P002	2.77 lbs. of VOC per hour	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	Y	N	This emissions unit is not subject to CAM because this emissions unit's emission standard is not controlled. ET – Emission testing for VOC is required.
P002	1.91 lbs. of PE/PM10 per hour	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	Y	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). See B.3 (controls PE),

															Table 2 of B.3 above. ET – Emission testing for PE/PM10 is required.
P002	12.13 TPY VOC	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is not subject to CAM because this emissions unit's emission standard is not controlled. Annual limit established at controlled PTE. Compliance with the annual limit is demonstrated if compliance with the short-term limit is demonstrated.
P002	8.32 TPY PE/PM10	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). See B.3 (controls PE), Table 2 of B.3 above. Annual limit established at controlled PTE. Compliance with the annual limit is demonstrated if compliance with the short-term limit is demonstrated.
P002	20% VEs	17-07(A)(1)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). See B.3 (controls PE), Table 2 of B.3 above. M, R, Rp – VE checks required.
P901	52 lbs PE/PM10 per hour	17-11(B)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit's pre-controlled emission standard is below 100 per year. M, R, Rp – Parametric monitoring is required.
P901	20% VEs	17-07(A)(1)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit's pre-controlled emission particulate standard is below 100 per year. M, R, Rp – VE checks required.
P902	1.23 lb PE/PM10 per hour	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit's pre-controlled stack emission standard is below 100 per

	from conveying														year. M, R, Rp – Parametric monitoring is required.
P902	0.57 lb PE/PM10 per hour from unloading	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit's pre-controlled stack emission standard is below 100 per year. M, R, Rp – Parametric monitoring is required.
P902	5.39 TPY PE/PM10 from conveying	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is not subject to CAM because this emissions unit's pre-controlled stack emission standard is below 100 per year. Annual limit established at controlled PTE. Compliance with the annual limit is demonstrated if compliance with the short-term limit is demonstrated.
P902	2.50 TPY PE/PM10 from unloading	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is not subject to CAM because this emissions unit's pre-controlled stack emission standard is below 100 per year. Annual limit established at controlled PTE. Compliance with the annual limit is demonstrated if compliance with the short-term limit is demonstrated.
P902	1% VEs	17-07(A)(1)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	This emissions unit is not subject to CAM because this emissions unit is subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – VE checks required.
T006 T007	7.65 TPY VOC from each tank	31-05(A)(3)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units' are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b).

															Annual limit established considering operational restriction. Compliance with the annual limit is demonstrated if compliance with the operational restriction is demonstrated.
T006 T007	0.32 TPY PE/PM10 from each tank	31-05(A)(3)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units' emission standard is not controlled. Annual limit established considering operational restriction. Compliance with the annual limit is demonstrated if compliance with the operational restriction is demonstrated.
T006 T007 P004 P005	3.98 TPY PM10 combined based on a rolling, 12-month summation when burning natural gas exclusively in the asphalt preheater	31-05(D)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units' emission standard is not controlled. M, R, Rp – rolling, 12-month summation Combined limit established considering operational restrictions. Compliance with the combined limit is demonstrated if compliance with the operational restrictions are demonstrated.
T006 T007 P004 P005	3.80 TPY PM10 combined based on a rolling, 12-month summation when burning natural gas & the maximum allowable amount of	31-05(D)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	Theses emissions units are not subject to CAM because these emissions units' emission standard is not controlled. M, R, Rp – rolling, 12-month summation Combined limit established considering operational restrictions. Compliance with the combined limit is demonstrated if compliance with the operational restrictions are demonstrated.

	No. 2 fuel oil in the asphalt preheater														
T006 T007	16,111,110 gallons per year, per tank, based on a rolling, 12-month summation	31-05(D)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because the gallon restriction is not an emission standard. M, R, Rp – rolling, 12-month summation.
T006 T007	Monthly avg maximum storage temperature shall not exceed 390 degrees F per tank	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because the temperature restriction is being used to avoid being subject to a specific section 111 of the Clean Air Act. M, R – Temperature monitor, recorder, and high temperature alarm required.
T006 T007	0% VEs except for one 15 minute period when the transfer lines are being blown		40 CFR Part 60 Subpart UU	N	N	Y	Y	N	Y	Y	Y	Y	Y	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – VE checks required. ET – Emission testing for VEs required
P004 P005	0.055 lb PE/PM10 per ton of asphalt	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	Y	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). ET – emission testing required for PE/PM10
P004 P005	7.6 lbs PE/PM10	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	These emissions units are not subject to CAM because these emissions units are subject to

	per million cubic feet of natural gas														section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). Compliance based on use of emission factor.
P004 P005	2 lbs PE/PM10 per 1000 gallons fuel oil	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). Compliance based on use of emission factor.
P004 P005	3.34 TPY PE/PM10 when burning natural gas exclusively in the asphalt preheater	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – PM10 emissions, rolling 12-month summation
P004 P005	3.16 TPY PE/PM10 when when burning natural gas & the maximum allowable amount of No. 2 fuel oil in the asphalt preheater	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – PM10 emissions, rolling 12-month summation
P004 P005	0.0033 lb VOC per ton of asphalt	31-05(A)(3)		N	N	Y	Y	N	Y	Y	Y	Y	Y	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). ET – emission testing required for PE/PM10
P004 P005	5.5 lbs VOC per million	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40

	cubic feet of natural gas														CFR Part 64.2(b). Compliance based on use of emission factor.
P004 P005	0.34 lb VOC per 1000 gallons fuel oil.	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). Compliance based on use of emission factor.
P004 P005	0.42 TPY VOC from emissions units P004 and P005, combined, when burning natural gas exclusively in the asphalt preheater	31-05(A)(3)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – rolling, 12-month summation Compliance based on use of emission factor and emission test data.
P004 P005	0.35 TPY VOC from emissions units P004 and P005, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the	31-05(A)(3)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – rolling, 12-month summation Compliance based on use of emission factor and emission test data.

	asphalt preheater														
P004 P005	Emissions of sulfur dioxide (SO2) shall not exceed 46.90 TPY from emissions units P004 and P005, combined, based upon a rolling, 12-month summatio n burning natural gas exclusivel y in the asphalt preheater	31-05(D)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	Theses emissions units are not subject to CAM because these emissions units' emission standard is not controlled. M, R, Rp – Rolling, 12- month summations
P004 P005	Emissions of SO2 shall not exceed 49.99 TPY from emissions units P004 and P005, combined, based upon a rolling, 12-month summatio	31-05(D		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	Theses emissions units are not subject to CAM because these emissions units' emission standard is not controlled. M, R, Rp – Rolling, 12- month summations

	n when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater														
P004 P005	SO2 emissions shall not exceed 0.6 pound per million cubic feet of natural gas	31-05(D)		N	N	N	N	N	N	N	N	N	N	N	These emissions units are not subject to CAM because these emissions units' emission standard is not controlled. Compliance based on use of emission factor. Pursuant to OAC rule 3745-18-04(F)(4), the SO2 emission rate for natural gas shall be considered to be 0.0 pounds/MMBtu.
P004 P005	SO2 emissions shall not exceed 71 pounds per 1000 gallons of No. 2 fuel oil from each of the asphalt preheaters	31-05(D)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units' emission standard is not controlled. M, R, Rp – Oil quality requirements
P004 P005	See Comment section*		ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	N	N	These emissions units are not subject to CAM because these emissions units' emission standard is not controlled. Compliance based on use of emission factors.

															*Emissions of nitrogen oxides (NOx) shall not exceed 0.12 pound per ton of asphalt. NOx emissions shall not exceed 100 pounds per million cubic feet of natural gas or 20 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater. Emissions of carbon monoxide (CO) shall not exceed 0.59 pound per ton of asphalt. CO emissions shall not exceed 84 pounds per million cubic feet of natural gas or 5 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater. Emissions of SO2 shall not exceed 0.86 pound per ton of asphalt. SO2 emissions shall not exceed 0.6 pound per million cubic feet of natural gas or 71 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.
P004 P005	For the asphalt preheater portion of these emissions units, visible PE from the stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule	17-07(A)(1)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – VE checks required.

P004 P005	109,000 tons of asphalt per year when burning natural gas exclusively in the asphalt preheater or 99,400 tons of oxidized asphalt per year when burning natural gas in combination with no more than 203,720 gallons of No. 2 fuel oil per year, in emissions units P004 and P005, combined	31-05(C) and (D)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because this limitation is a processing limitation, not emission standard. M, R, Rp – Rolling, 12- month summations
P004 P005	The quality of the oil burned in the asphalt preheater portion of these	31-05(D)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units' emission standard is not controlled. M, R, Rp – Oil quality requirements

	emissions units shall meet a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in this permit for SO2 emissions from the asphalt preheaters														
P004 P005	0% opacity unless an opacity limit for the blowing stills when fuel oil is used to fire the afterburner (thermal oxidizer) has been established		40 CFR Part 60 Subpart UU	N	N	Y	Y	N	Y	Y	Y	Y	N	N	These emissions units are not subject to CAM because these emissions units are subject to section 111 or 112 of the Clean Air Act per 40 CFR Part 64.2(b). M, R, Rp – VE checks required.
T003 T004 T005	The permittee shall not place,	21-09(L)		N	N	N	N	N	Y	N	Y	N	N	N	These emissions units are not subject to CAM because these emissions units do not use controls to comply with any such emission

	store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof														limitation or standard. Exemption from the requirement to operate an internal floating roof for low vapor pressure petroleum liquids. R, Rp – Vapor pressure

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit
for
Atlas Roofing Corporation, Franklin Roofing Facility

Facility ID:	1483040201
Permit Number:	P0107344
Permit Type:	Renewal
Issued:	8/30/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Atlas Roofing Corporation, Franklin Roofing Facility

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Inspections and Information Requests 14
26. Scheduled Maintenance/Malfunction Reporting 14
27. Permit Transfers 15
28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15

B. Facility-Wide Terms and Conditions 16
C. Emissions Unit Terms and Conditions 18
1. P001, Shingle Saturator and Granule application 19
2. P002, Felt Saturator 26
3. P901, Granule and Back Surfacing Unloading 33
4. P902, Filler Unloading, Conveyance, Storage, Heating, and Mixing 37
5. Emissions Unit Group - 374,000 Gallon Flux Tanks 1 & 2: T006, T007, ... 43
6. Emissions Unit Group - Asphalt Blowing Stills: P004, P005, ... 53
7. Emissions Unit Group - Asphalt Storage Tanks: T003, T004, T005, ... 74

Authorization

Facility ID: 1483040201
Facility Description: Franklin Roofing Facility (Asphalt Roofing Shingle Production)
Application Number(s): A0040888
Permit Number: P0107344
Permit Description: Renewal Title V Permit for an asphalt roofing shingle production facility which includes several natural gas and no. 2 fuel oil boilers and heaters, a couple of cold cleaners operations, several storage tanks containing both no. 2 fuel oil and asphalt, an asphalt shingle coating line, a saturated felt machine line, and a couple of flux asphalt blow still operations.
Permit Type: Renewal
Issue Date: 8/30/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0100499

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Atlas Roofing Corporation, Franklin Roofing Facility
675 Oxford Road
Franklin, OH 45005

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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Hamilton County Dept. of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Hamilton County Dept. of Environmental Services.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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, in accordance with Standard Term and Condition A.11 below. 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.

(1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthepermittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; ora combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(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 paragraph (E) of OAC rule 3745-77-03.Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(3) 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:

(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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)Records Retention Requirements Under State Law Only

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.

25. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

26. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

27. 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.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units are located at this facility:

   d) B001 5.23 MMBtu/hr gas and No. 2 oil boiler

   B002 10.00 MMBtu/hr gas and No. 2 oil heater
   B005 5.30 MMBtu/hr gas and No. 2 oil heat exchanger
   B011 5.23 MMBtu/hr natural gas and No. 2 fuel oil steam boiler
   B012 7.50 MMBtu/hr natural gas and No. 2 fuel oil asphalt heater
   B022 4.50 MMBtu/hr natural gas and No. 2 fuel oil asphalt heater
   L001 Manual non-halogenated solvent parts cold cleaner (PTI 14-3029)
   L002 Manual non-halogenated solvent parts cold cleaner (PTI 14-3029)
   P006 Shingle Printing Ink
   T002 No. 2 fuel oil storage tank

   e) T008 Coating Tank 6 - 38,000 gallon heated coating asphalt fixed roof storage tank with submerged filling (PTI P0105995)

   f) T009 15,000 gallon Laminate Adhesive Asphalt Tank (PTI P0106142)

   Each insignificant emissions unit at this facility must comply with all applicable state and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

3. The Ohio EPA has determined that this facility is subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, USEPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by USEPA. For more information on the area source rules, please refer to the following USEPA website: http://www.epa.gov/ttn/atw/area/arearules.html

   The area source rule(s) that apply are:

   40 CFR Part 63, Subpart AAAAAAA; National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing.

C. Emissions Unit Terms and Conditions

1. P001, Shingle Saturator and Granule application

Operations, Property and/or Equipment Description:

73.8 TPH asphalt shingle coating line with wet filters, precooler, and 200 gallon heated sealant asphalt day tank

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05396)	Emissions of volatile organic compounds (VOC) shall not exceed 1.25 pounds per hour and 5.52 tons per year (TPY) from this emissions unit. Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.22 pound per hour and 0.96 TPY from this emissions unit. See b)(2)a. and b)(2)b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart AAAAAAA (40 CFR 63.11559-11567)	See Facility Wide Terms and Conditions section B.3.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.11559 and 40 CFR 63.11566, this emissions unit constitutes "asphalt coating equipment" (coater, coating mixer) at an existing asphalt roofing manufacturing facility which is an Area Source of HAPs emissions.]	
e.	40 CFR Part 60 Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture. As defined in 40 CFR 60.470(b), this emissions unit is an existing saturator.	As an existing saturator, this emissions unit is exempt from the requirements of 40 CFR Part 60 Subpart UU because this emissions unit was installed in 1977 and to be subject to Subpart the emissions unit had to be installed after November 8, 1980.

(2) Additional Terms and Conditions

a. The hourly VOC and PE/PM10 emission limits were established to reflect the potential to emit for this emissions unit on a controlled basis. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emission limitations beyond the parametric monitoring of the control device.

Based on these hourly potential emission rates, the unrestricted, controlled, PTE VOC and PE/PM10 emissions from this emissions unit, based on 8,760 hours of operation per year, are 5.52 TPY and 0.96 TPY, respectively. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these annual emission limitations beyond the parametric monitoring of the control device.

b. The emissions from this emissions unit shall be vented to the wet filters and precooler at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the wet filters and precooler is between 4.0 and 15.0 inches of water.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the wet filters and precooler when

the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the wet filters and precooler on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. A description of the corrective action;

b. The date corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The pressure drop readings immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the wet filters and precooler is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with

the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05396:d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each period of time (start time and date, and end time and date) when the pressure drop across the wet filters and precooler was outside of the acceptable range;

b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the wet filters and precooler;

c. Each incident of deviation described in a (above) where a prompt investigation was not conducted;

d. Each incident of deviation described in a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. Each incident of deviation described in a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05396: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

Authority for term: (OAC rule 3745-17-03(B)(1)(a), OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

b. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.22 pound per hour.

Applicable Compliance Methods:

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

The emission testing shall be conducted within 6 months prior to the permit expiration;

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM10;

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PE/PM10, Methods 1-5 of 40 CFR Part 60, Appendix A

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

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the

proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

Emissions of VOC shall not exceed 1.25 pounds of VOC per hour.

Applicable Compliance Methods:

Compliance with the lbs of VOC/hr emission limitation was most recently demonstrated by a stack test conducted on 8/22/2006 when a VOC emission rate of 0.59 lb/hr was achieved.

Should additional testing be required, Methods 1-4 and 25 from 40 CFR Part 60 Appendix A shall be used.

d. Emission Limitations:

Emissions of VOC shall not exceed 5.52 TPY.

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.96 TPY

Applicable Compliance Methods:

Compliance with the annual emission limitations shall be demonstrated by incorporating the actual annual asphalt shingle production and asphalt sealant usage in the following equations using the emission factors as supplied in the Application for PTI 14-05396, issued 4/8/2003, and USEPA Tanks 4.09d emission calculation software for the sealant asphalt day tank VOC emissions:

Actual annual asphalt shingle production, tons/year x VOC emission factor, 0.017 pound of VOC/ton x 1 Ton/2000 pounds = TPY of VOC.

Actual asphalt sealant usage, gallons/year, input into Tanks 4.09d software with emissions resulting in pounds of VOC/year x 1 Ton/2000 pounds = TPY of VOC.

Actual annual asphalt shingle production, tons/year x PE/PM10 emission factor, 0.003 pound of PE/PM10/ton x 1 Ton/2000 pound = TPY of PE/PM10.

The annual emission limitations were established by multiplying the short-term emission limitations by the PTE annual operating scenario of 8760 hours:

1.25 pounds of VOC/hour x 8760 hours/year x 1 Ton/2000 pounds = 5.48 TPY of VOC.

504,464 gallons asphalt sealant usage input into Tanks 4.09d software resulting in 79.1 pounds of VOC/year x 1 Ton/2000 pounds = 0.04 TPY of VOC.

5.48 TPY of VOC + 0.04 TPY of VOC = 5.52 TPY of VOC.

0.22 pound of PE/PM10/hour x 8760 hours/year x 1 Ton/2000 pounds = 0.96 TPY of PE/PM10.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05396: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

2. P002, Felt Saturator

Operations, Property and/or Equipment Description:

8.3 TPH saturated felt machine with wet filters and precooler

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05396)	Emissions of volatile organic compounds (VOC) shall not exceed 2.77 pounds per hour and 12.13 tons per year (TPY) from this emissions unit. Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 1.91 pounds per hour and 8.37 TPY from this emissions unit. See b)(2)a. and b)(2)b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart AAAAAAA (40 CFR 63.11559-11567)	See Facility Wide Terms and Conditions section B.3.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.11559 and 40 CFR 63.11566, this emissions unit constitutes "asphalt coating equipment" (coater, coating mixer) at an existing asphalt roofing manufacturing facility which is an Area Source of HAPs emissions.]	
e.	40 CFR Part 60 Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture. As defined in 40 CFR 60.470(b), this emissions unit is an existing saturator.	As an existing saturator, this emissions unit is exempt from the requirements of 40 CFR Part 60 Subpart UU because this emissions unit was installed in 1977 and to be subject to this Subpart the emissions unit had to be installed after November 8, 1980.

(2) Additional Terms and Conditions

a. The hourly VOC and PE/PM10 emission limits were established to reflect the potential to emit for this emissions unit on a controlled basis. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emission limitations beyond the parametric monitoring of the control device.

Based on these hourly potential emission rates, the unrestricted, controlled, PTE VOC and PE/PM10 emissions from this emissions unit, based on 8,760 hours of operation per year, are 12.13 TPY and 8.37 TPY, respectively. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these annual emission limitations beyond the parametric monitoring of the control device.

b. The emissions from this emissions unit shall be vented to the wet filters and precooler at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the wet filters and precooler is between 4.0 and 15.0 inches of water.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the wet filters and precooler when

the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the wet filters and precooler on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. A description of the corrective action;

b. The date corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The pressure drop readings immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the wet filters and precooler is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with

the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05396:d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each period of time (start time and date, and end time and date) when the pressure drop across the wet filters and precooler was outside of the acceptable range;

b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the wet filters and precooler;

c. Each incident of deviation described in a (above) where a prompt investigation was not conducted;

d. Each incident of deviation described in a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. Each incident of deviation described in a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05396: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

Authority for term: (OAC rule 3745-17-03(B)(1)(a), OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

b. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 1.91 pound per hour.

Applicable Compliance Methods:

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

The emission testing shall be conducted within 6 months prior to the permit expiration;

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE/PM10;

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PE/PM10, Methods 1-5 of 40 CFR Part 60, Appendix A

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

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the

proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

2.77 pounds of VOC per hour.

Applicable Compliance Methods:

Compliance with the lbs of VOC/hr emission limitation was most recently demonstrated by a stack test conducted on 12/8/2005 when a VOC emission rate of 2.41 lbs/hr was achieved.

Should additional testing be required, Methods 1-4 and 25 from 40 CFR Part 60 Appendix A shall be used.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

d. Emission Limitations:

Emissions of volatile organic compounds (VOC) shall not exceed 12.13 tons per year (TPY).

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 8.37 TPY

Applicable Compliance Methods:

Compliance with the annual emission limitations shall be demonstrated by incorporating the actual annual asphalt shingle production in the following

equations using the emission factors as supplied in the Application for PTI 14-05396, issued 4/8/2003:

Actual annual asphalt shingle production, tons/year x VOC emission factor, 0.333 pound of VOC/ton of asphalt shingle production x 1 Ton/2000 pounds = TPY of VOC.

Actual annual asphalt shingle production, tons/year x PE/PM10 emission factor, 0.229 pound of PE/PM10/ton of asphalt shingle production x 1 Ton/2000 pound = TPY of PE/PM10.

The annual emission limitations were established by multiplying the short-term emission limitations by the PTE annual operating scenario of 8760 hours:

2.77 pound of VOC/hour x 8760 hours/year x 1 Ton/2000 pounds = 12.13 TPY of VOC.

1.91 pound of PE/PM10/hour x 8760 hours/year x 1 Ton/2000 pounds = 8.37 TPY of PE/PM10.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05396: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

3. P901, Granule and Back Surfacing Unloading

Operations, Property and/or Equipment Description:

57 tons/hour back surfacing (talc) and 50 tons/hr roofing granules unloading with fabric filter

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
c.	OAC rule 3745-17-08(B)	This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
d.	OAC rule 3745-17-11(B) Based on Table I.	Particulate emissions (PE) shall not exceed 52 pounds per hour from this emissions unit.
e.	40 CFR Part 60 Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture. As defined in 40 CFR 60.470(b), this emissions	As an existing mineral handling system, this emissions unit is exempt from the requirements of 40 CFR Part 60 Subpart UU because this emissions unit was installed in 1977 and to be subject to this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	unit is an existing mineral handling system.	Subpart the emissions unit had to be installed after November 8, 1980.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse filters during transport shall be 6-8 inches of water.

Authority for term: (OAC rule 3745-77-07(C)(1))

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. A description of the corrective action;

b. The date corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The pressure drop readings immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

Authority for term: (OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. Each incident of deviation described in a (above) where a prompt investigation was not conducted;

d. Each incident of deviation described in a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. Each incident of deviation described in a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

Authority for term: (OAC rule 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

Authority for term: (OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

Particulate emissions (PE) shall not exceed 52 pounds per hour from this emissions unit.

Applicable Compliance Method:

Compliance may be demonstrated by the following calculation:

0.0099 lb of PE/ton of material handled* X 107 tons per hour = 1.06 lbs of PE/Hr.

Emission Factor taken from AP-42 Table 11.19.2-4 (English Units), emission factors for pulverized mineral processing operations, product storage/handling.

If required, compliance with the short-term emission limitation shall be demonstrated by emission tests using Methods 1-5 of 40 CFR Part 60, Appendix A.

Authority for term: (OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

4. P902, Filler Unloading, Conveyance, Storage, Heating, and Mixing

Operations, Property and/or Equipment Description:

57 TPH limestone filler unloading and 30.8 TPH conveying, storage, heating, and mixing with Fuller fabric filter

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05396)	Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 1.23 pounds per hour and 5.39 tons per year (TPY) from the conveying, storage, heating, and mixing. PE and PM10 shall not exceed 0.57 pound per hour and 2.50 TPY from the unloading. The requirements of this rule also includes compliance with 40 CFR Part 60 Subpart UU. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60.472(d).
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart UU (40 CFR 60.470-474) [In accordance with 40 CFR 60.470	As specified in 40 CFR 60.472(d), visible particulate emissions from this emissions unit shall not exceed 1 percent opacity as a six-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	this emissions unit is a mineral handling and storage facility that commenced construction or modification after November 18, 1980.]	

(2) Additional Terms and Conditions

a. The hourly PE/PM10 emission limits were established to reflect the potential to emit for this emissions unit on a controlled basis. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emission limitations beyond the parametric monitoring of the control device.

Based on these hourly potential emission rates, the unrestricted, controlled, PTE PE/PM10 emissions from this emissions unit, based on 8,760 hours of operation per year, are 5.39 TPY from conveying and 2.50 TPY from unloading, respectively. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these annual emission limitations beyond the parametric monitoring of the control device.

b. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse filters during transport shall be 6-8 inches of water.

Authority for term: (OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a dailybasis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the

cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. A description of the corrective action;

b. The date corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The pressure drop readings immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

Authority for term: (OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-05396:d)(1) and d)(2).

The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. Each incident of deviation described in a (above) where a prompt investigation was not conducted;

d. Each incident of deviation described in a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. Each incident of deviation described in a where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

Authority for term: (OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 14-05396: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 1 percent opacity as a six-minute average.

Applicable Compliance Method:

If, required compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

Authority for term: (40 CFR 60.472(d), OAC rules 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1))

b. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 1.23 pounds per hour from the conveying, storage, heating, and mixing.

PE and PM10 shall not exceed 0.57 pound per hour from the unloading.

Applicable Compliance Method:

Compliance with the lb(s)/hr of PE emission limitations may be shown by the following calculations based on information supplied in the Application for Permit to Install (PTI) 14-05396, issued 4/8/2003 for this emissions unit and applying the Control Efficiency (CE) for the fabric filter:

30.8 tons of conveying, storage, heating, mixing/hour x 0.8 pound of PE/PM10/ton conveying, storage, heating, mixing x (1 – 0.95 CE) = 1.23 pound of PE/PM10/hour.

57 tons of unloading/hour x 0.2 pound of PE/PM10/ton of unloading x (1 – 0.95 CE) = 0.57 pound of PE/PM10/hour.

If required, compliance with the short-term emission limitations shall be demonstrated by emission tests using Method 1-5 of 40 CFR Part 60, Appendix A.

Authority for term: (OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))

c. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 5.39 tons per year (TPY) from the conveying, storage, heating, and mixing.

PE and PM10 shall not exceed 2.50 TPY from the unloading.

Applicable Compliance Methods:

Compliance with the annual emission limitations shall be demonstrated by multiplying the actual amount of limestone used (conveying, storage, heating, mixing) and unloaded by the facility-supplied Emission Factors in the Application

for PTI 14-05396, and applying the CE for the fabric filter, in the following calculations:

Actual limestone used, tons/year x 0.8 pound of PE/PM10/ton x (1 – 0.95 CE) x 1 Ton/2000 pounds = TPY of PE/PM10 from conveying, storage, heating, and mixing.

Actual limestone unloaded, tons/year x 0.2 pound of PE/PM10/ton x (1 – 0.95 CE) x 1 ton/2000 pounds = TPY of PE/PM10 from unloading.

The annual emission limitations were established based on information supplied in the Application for Permit to Install (PTI) 14-05396, issued 4/8/2003 for this emissions unit:

1.23 pound of PE/PM10/hour x 8760 hour/year x 1 Ton/2000 pounds = 5.39 TPY of PE/PM10.

0.57 pound of PE/PM10/hour x 8760 hour/year x 1 Ton/2000 pounds = 2.50 TPY of PE/PM10.

Authority for term: (OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 14-05396: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -374,000 Gallon Flux Tanks 1 & 2: T006, T007,

EU ID	Operations, Property and/or Equipment Description
T006	Flux Tank 1 - 374,000 gallon heated asphalt flux fixed roof storage tank with submerged filling
T007	Flux Tank 2 - 374,000 gallon heated asphalt flux fixed roof storage tank with submerged filling

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Emissions of volatile organic compounds (VOC) shall not exceed 7.65 tons per year (TPY) from each storage tank. Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.32 TPY from each storage tank. See b)(2)a., b)(2)b., b)(2)c., and b)(2)i.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06 OAC rule 3745-31-05(C), as effective 12/01/06 Voluntary limit to avoid BAT.	See b)(2)d.
c.	OAC rule 3745-31-05(D) To avoid non-attainment review for PM2.5. To avoid being subject to State air dispersion modeling requirements for PM10.	See b)(2)e. and c)(1).

d.	OAC rule 3745-21-09(L)(1)	See b)(2)f.
e.	OAC rule 3745-21-09(L)(4)	See b)(2)g.
f.	40 CFR Part 60, Subpart Kb	See b)(2)h.
g.	40 CFR Part 60, Subpart UU (40 CFR 60.470 - 40 CFR 60.474) [In accordance with 40 CFR 60.470(b) these emissions units are storage tanks that store asphalt used for roofing subject to the emission limitations and/or control measures specified in this section.]	Once b)(2)c. is effective, then for each "storage tank" (as defined in 60.470(b)) the opacity limitation listed in b)(2)i. is retained as the effective limitation for these emissions units. See b)(2)i.

(2) Additional Terms and Conditions

a. To ensure the maximum true vapor pressure of the stored material does not exceed 5.2 kPa, the monthly average maximum storage temperature of the flux asphalt stored in this tank shall not exceed 390 degrees Fahrenheit.

b. The permittee shall employ an emissions control device with a minimum control efficiency of 85% for PE and PM10.

c. 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 revision 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.

d. These rule paragraphs apply 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 PE and PM10 emissions from this air contaminant source since the uncontrolled potential to emit for PE and PM10 is less than 10 tons/yr.

Permit to Install (PTI) P0108369 for this air contaminant sources 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 BAT requirements under OAC rule 3745-31-05(A)(3):

i. To ensure the maximum true vapor pressure of the stored material does not exceed 5.2 kPa, the monthly average maximum storage temperature of the flux asphalt stored in this tank shall not exceed 390 degrees Fahrenheit;

ii. The maximum annual throughput of flux asphalt from each tank shall not exceed 16,111,110 gallons per year; and

iii. VOC emissions shall not exceed 7.65 tons per year (TPY) from each storage tank.

e. Emissions of PM10 shall not exceed 3.98 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas exclusively in the asphalt preheater.

Emissions of PM10 shall not exceed 3.80 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

f. These emissions units are exempt from the vapor control equipment requirements since the petroleum liquid stored product, as outlined in PTI Application A0038654 submitted February 4, 2010, does not have a true vapor pressure greater than 1.52 pound per square inch absolute.

g. If an owner or operator places, stores, or holds in a fixed roof tank, that is not exempted pursuant to OAC rule 3745-21-09(L)(2), any petroleum liquid with a true vapor pressure which is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of OAC rule 3745-21-09(L)(1), the owner or operator shall so notify the Hamilton County Department of Environmental Services within thirty days of becoming aware of the occurrence.

h. The permittee has proposed to avoid the control requirements pursuant to 40 CFR Part 60, Subpart Kb by voluntarily restricting the hot asphalt storage temperature. Restricting the hot asphalt storage temperature will, in turn, restrict the maximum true vapor pressure of the flux asphalt stored to less than 5.2 kPa. The permittee has proposed to determine compliance with the voluntary vapor pressure restriction by monitoring and recording the storage temperature and determining the flux asphalt vapor pressure pursuant to the requirements in 40 CFR 60.116b(e)(1) using the methods outlined in the emissions factor document "Estimates of Air Emissions from Asphalt Storage Tanks and Truck Loading", Environmental Progress, Vol. 18, No.4, 1999.

i. See 40 CFR Part 60, Subpart UU (40 CFR 60.472(c)).

c) Operational Restrictions

(1) The net annual throughput of flux asphalt from each tank shall not exceed 16,111,110 gallons per year based upon rolling, 12-month summations.

Authority for term: (OAC rules 3745 77 07(A)(1) and 3745-31-05)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each storage tank:

a. The actual throughput of flux asphalt, in gallons; and

b. The rolling, 12-month summation of the flux asphalt throughput, in gallons.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(2) For PM10 emissions, the permittee shall maintain the following information for emissions units P004, P005, T006 and T007, combined, when burning natural gas exclusively in the asphalt preheater:

a. The oxidized asphalt production rate, in tons;

b. The updated rolling, 12-month summation of the oxidized asphalt production rate, in tons; and

c. The updated rolling, 12-month summation PM10 emissions, in tons, from asphalt blowing and natural gas combustion in the asphalt preheater:

for PM10, the summation of: b. multiplied by 0.055 pound per ton of asphalt and divided by 2000 pounds per ton and, the actual amount of natural gas burned in the asphalt preheater, in millions of cubic feet per 12-month period, multiplied by 7.6 pounds per million cubic feet and divided by 2000 pounds per ton, and the summation of the PM10 emissions from T006 and T007 as calculated by the Tanks 4.09d emissions estimation software using the rolling, 12-month summation of the flux asphalt throughput as recorded in d)(1).

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(3) For PM10 emissions, the permittee shall maintain the following information for emissions units P004, P005, T006 and T007, combined, when burning natural gas in combination with No. 2 fuel oil in the asphalt preheater:

a. The amount of No. 2 fuel oil burned, in gallons;

b. The oxidized asphalt production rate, in tons;

c. The updated, rolling, 12-month summation of the amount of No. 2 fuel oil burned, in gallons;

d. The updated, rolling, 12-month summation of the oxidized asphalt production rate, in tons; and

e. The updated rolling, 12-month summation PM10 emissions, in tons, from asphalt blowing and natural gas and No. 2 fuel oil combustion in the asphalt preheater:

for PM10, the summation of: b. multiplied by 0.055 pound per ton of asphalt and divided by 2000 pounds per ton and, c. multiplied by 0.002 pound per gallon of No. 2 fuel oil, and divided by 2000 pounds per ton, and the actual amount of natural gas burned in the asphalt preheater, in millions of cubic feet per 12-month period, multiplied by 7.6 pounds per million cubic feet and divided by 2000 pounds per ton, and the summation of the PM10 emissions from T006 and T007 as calculated by the Tanks 4.09d emissions estimation software using the rolling, 12-month summation of the flux asphalt throughput as recorded in d)(1).

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(4) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the storage temperature in the flux asphalt storage tank. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

Available data on the storage temperature may be used to determine the maximum true vapor pressure. For vessels operated above or below ambient temperature, the maximum true vapor pressure shall be calculated based upon the average temperature as calculated from the data-set of all temperatures recorded during each month.

The permittee shall maintain a log of the downtime of the continuous temperature monitoring and recording equipment when the flux asphalt tank contains product and is being heated.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(5) The permittee shall install a high temperature alarm set to alert when a temperature of greater than 390 degrees Fahrenheit is recorded. The permittee shall maintain a log of the date, time of day, duration and recorded temperature when the alarm alerts to a temperature of greater than 390 degrees Fahrenheit.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(6) The permittee shall perform daily 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. The total duration of any visible emissions incident; and

c. Any corrective actions taken to eliminate the visible emissions.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108369:d)(1)-d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the rolling, 12-month emissions limitations for PM10;

b. All exceedances of the rolling, 12-month flux asphalt throughput limitations;

c. All exceedances of the monthly average maximum storage temperature of the flux asphalt; and

d. All instances of downtime of the capture (collection) system and/or the continuous temperature monitoring and recording equipment when the flux asphalt tank(s) contains product and is being heated.

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

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05))

(2) Except as provided in 40 CFR 60.116b(g), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 cubic meters but less than 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Hamilton County Department of Environmental Services within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(3) 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 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.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0108369: e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation & Voluntary Restriction:

Emissions of volatile organic compounds (VOC) shall not exceed 7.65 tons per year (TPY) from each storage tank.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation and voluntary restriction shall be demonstrated by inputting the actual operating parameters (product throughput, product vapor pressure(s), etc.) for the calendar year into the USEPA Tanks 4.09d emissions calculation software and generating an Annual Emissions Report in TPY VOC for each tank.

Tanks 4.09d was used to calculate the allowable VOC of 7.65 TPY based on the following data as reported in Application A0038654 for PTI P0105996 (superseded with PTI P0108369) submitted 2/4/2010:

i. Allowable annual flux asphalt throughput 16,111,110 gallons;

ii. Daily Liquid Surface Temperatures for a Heated Tank of 390 deg. F. average, minimum, & maximum;

iii. Liquid Bulk Temperature for a Heated Tank of 390 deg. F.; and

iv. Liquid Contents (asphalt) Vapor Pressures of 0.55 psia average, minimum, & maximum with a Vapor Molecular Weight of 84.

The uncontrolled PTE VOC from each tank in the absence of the flux asphalt Operational Restriction on throughput is 10.19 TPY.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05))

b. Emission Limitations:

Emissions of PM10 shall not exceed 3.98 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas exclusively in the asphalt preheater.

Emissions of PM10 shall not exceed 3.80 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

Applicable Compliance Method:

Compliance with the rolling, 12-month summations of PM10 shall be demonstrated by the recordkeeping requirements in d)(2) and d)(3).

The rolling, 12-month PM10 emissions limitations were calculated based on information submitted in PTI Application A0038654, February 2010, for Permit Number P0105996 (superseded with PTI P0108369). See f)(1)c.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

c. Emission Limitation & Emission Exemption:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.32 TPY from each storage tank.

Applicable Compliance Method:

Compliance with the annual PE/PM10 emissions limitation shall be demonstrated by multiplying the actual VOC emissions as calculated in f)(1)a. by 0.22 and dividing by 0.78 pursuant to the method for calculating PE/PM10 outlined in “Estimates of Air Emissions from Asphalt Storage Tanks and Truck Loading”, Table 4, 1999, as included in Application A0038654 for PTI P0105996 (superseded with PTI P0108369) submitted 2/4/2010.

This method was used to calculate both the uncontrolled PTE of PE/PM10 of 2.87 TPY and the controlled PTE of PE/PM10 of 0.32 TPY based on the information supplied in the application:

7.65 TPY VOC, uncontrolled, restricted x 0.22/0.78 = 0.32 TPY of PE/PM10 per tank; and

10.19 TPY VOC, uncontrolled, unrestricted x 0.22/0.78 = 2.87 TPY of PE/PM10 per tank.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

d. Emission Limitation:

No owner or operator subject to the provisions of 40 CFR Part 60, Subpart UU shall cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent, except for one consecutive 15-minute period when the transfer lines are being blown for clearing.

Applicable Compliance Method:

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

The emissions testing shall be conducted within 3 months after issuance of PTI P0108369;

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9;

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;

Not later than 30 days prior to the propose 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 propose test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission test(s);

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Authority for term: (OAC rules 3745 77 07(C)(1) and 3745-31-05)

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0108369: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -Asphalt Blowing Stills: P004, P005,

EU ID	Operations, Property and/or Equipment Description
P004	24.3 TPH flux asphalt blow still No. 1 with thermal oxidizer (Egress Point ID B015; in common with EU P005)
P005	24.3 TPH flux asphalt blow still No. 2 with thermal oxidizer (Egress Point ID B015; in common with EU P004)

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) d)(10) – d)(13) and e)(2)l.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.055 pound per ton of asphalt. PE/PM10 emissions shall not exceed 7.6 pounds per million cubic feet of natural gas or 2 pounds per 1000 gallons of No. 2 fuel oil. PE/PM10 shall not exceed 3.34 tons per year (TPY) from emissions units P004 and P005, combined, when burning natural gas exclusively in the asphalt preheater. PE/PM10 shall not exceed 3.16 tons per year (TPY) from emissions units P004 and P005, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions of volatile organic compounds (VOC) shall not exceed 0.0033 pound per ton of asphalt. VOC emissions shall not exceed 5.5 pounds per million cubic feet of natural gas or 0.34 pound per 1000 gallons of No. 2 fuel oil. VOC emissions shall not exceed 0.42 TPY from emissions units P004 and P005, combined, when burning natural gas exclusively in the asphalt preheater. VOC emissions shall not exceed 0.35 TPY from emissions units P004 and P005, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater. For each "blowing still" (as defined in 60.471) the visible emission limitation established by this rule is less stringent than the visible emission limitation established pursuant to 40 CFR Part 60, Subpart UU; 40 CFR 60.472(b)(5). For the asphalt preheater portion of these emissions units, visible PE from the stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule. See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06.	See b)(2)b.
c.	OAC rule 3745-31-05(D) To avoid non-attainment review for PM2.5. To avoid being subject to State air dispersion modeling requirements for PM10.	See b)(2)c. See c)(2) and c)(3). Emissions of sulfur dioxide (SO2) shall not exceed 46.90 TPY from emissions units P004 and P005, combined, based upon a rolling, 12-month summation burning natural gas exclusively in the asphalt preheater.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	To avoid being a Title V Major Source of SO2 emissions.	Emissions of SO2 shall not exceed 49.99 TPY from emissions units P004 and P005, combined, based upon a rolling, 12-month summation when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater. SO2 emissions shall not exceed 0.6 pound per million cubic feet of natural gas or 71 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.
d.	OAC rule 3745-31-05(C), as effective 12/01/06 Voluntary limit to avoid BAT. OAC rule 3745-31-05(C), as effective 12/01/06 Voluntary limit on the allowable HAPs emissions to avoid being a Major Source of HAPs emissions subject to 40 CFR Part 63, Subpart LLLLL.	See b)(2)b. See c)(1).
e.	ORC 3704.03(T) Pursuant to the provisions of Senate Bill 265, for air permit installation applications submitted on or after August 3, 2009, with regard to Best Available Technology.	Emissions of nitrogen oxides (NOx) shall not exceed 0.12 pound per ton of asphalt. NOx emissions shall not exceed 100 pounds per million cubic feet of natural gas or 20 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater. Emissions of carbon monoxide (CO) shall not exceed 0.59 pound per ton of asphalt. CO emissions shall not exceed 84 pounds per million cubic feet of natural gas or 5 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater. Emissions of SO2 shall not exceed 0.86 pound per ton of asphalt. SO2 emissions shall not exceed 0.6 pound per million cubic feet of natural gas or 71 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.

f.	OAC rule 3745-17-07(A)(1)	For each "blowing still" (as defined in 60.471) the visible emission limitation established by this rule is less stringent than the visible emission limitation established pursuant to 40 CFR Part 60, Subpart UU; 40 CFR 60.472(b)(5). For the asphalt preheater portion of these emissions units, visible PE from the stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 12/01/06. Once b)(2)a. is effective, then for each "blowing still" (as defined in 60.471) the particulate emission limitation established by this rule is less stringent than the particulate emission limitation established pursuant to 40 CFR Part 60, Subpart UU; 40 CFR 60.472.
h.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T).
i.	40 CFR Part 60, Subpart UU (40 CFR 60.470 - 40 CFR 60.474) [In accordance with 40 CFR 60.470(b), these emissions units are blowing stills that processes and/or store asphalt used for roofing subject to the emission limitations/control measures specified in this section.]	The PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 12/01/06. Once b)(2)a. is effective, then for each "blowing still" (as defined in 60.471) the particulate emission limitation is based upon the provisions listed in 40 CFR Part 60, Subpart UU; 40 CFR 60.472(b). See b)(2)d.

(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 revision 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. These rule paragraphs apply 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 VOC emissions from these air contaminant sources since the uncontrolled potential to emit for VOC is less than 10 tons/yr each.

PTI P0108369 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. the maximum annual oxidized asphalt production from emissions units P004 and P005, combined, shall not exceed 109,000 tons of asphalt per year when burning natural gas exclusively in the asphalt preheater or 99,400 tons of oxidized asphalt per year when burning natural gas in combination with no more than 203,720 gallons of No. 2 fuel oil per year, in emissions units P004 and P005, combined;

ii. the use of a thermal oxidizer for control of PE/PM10 and VOC emissions;

iii. Emissions of PE/PM10 shall not exceed 3.34 tons per year (TPY) from emissions units P004 and P005, combined, when burning natural gas exclusively in the asphalt preheater; and

iv. Emissions of PE/PM10 shall not exceed 3.16 tons per year (TPY) from emissions units P004 and P005 when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

c. Emissions of PM10 shall not exceed 3.98 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas exclusively in the asphalt preheater.

Emissions of PM10 shall not exceed 3.80 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

d. See 40 CFR Part 60, Subpart UU (40 CFR 60.472(b)(5)).

c) Operational Restrictions

(1) In order for the facility to be considered a minor source of HCl (HAP) and not subject to requirements under 40 CFR Part 63, Subpart LLLLL, thepermittee shall not use the catalyst ferric chloride in emissions units P004 and P005.

Authority for term: (OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart LLLLL)

(2) For the purposes of avoiding air dispersion modeling ofPM10 emissions, as denoted in Ohio EPA's Engineering Guide #69, and to avoid being a major modification at a current non-attainment major stationary source for PM2.5 emissions, the maximum annual oxidized asphalt production from emissions units P004 and P005, combined, shall not exceed 109,000 tons of asphalt per year, based upon a rolling, 12-month summation, when burning natural gas exclusively in the asphalt preheater, or 99,400 tons of oxidized asphalt per year, based upon a rolling, 12-month summation, when burning natural gas in combination with no more than 203,720 gallons of No. 2 fuel oil per year, based upon a rolling, 12-month summation, in emissions units P004 and P005, combined. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the oxidized asphalt production, upon issuance of this permit.

Authority for term: (OAC rules 3745-77-07(A)(1) and 3745-31-05)

(3) The quality of the oil burned in the asphalt preheater portion of this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in this permit for SO2 emissions from the asphalt preheater.

Authority for term: (OAC rules 3745-77-07(A)(1) and 3745-31-05)

d) Monitoring and/or Recordkeeping Requirements

(1) For SO2 emissions, the permittee shall maintain monthly records of the following information for emissions units P004 & P005, combined, and for PM10 emissions, the permittee shall maintain the following information for emissions units P004, P005, T006 and T007, combined, when burning natural gas exclusively in the asphalt preheater :

a. The oxidized asphalt production rate, in tons;

b. The updated rolling, 12-month summation of the oxidized asphalt production rate, in tons; and

c. The updated rolling, 12-month summations of the SO2 and PM10 emissions, in tons, from asphalt blowing and natural gas combustion in the asphalt preheater:

i. For SO2, the summation of: b. multiplied by 0.86 pound per ton of asphalt and divided by 2000 pounds per ton and, the actual amount of natural gas burned in the asphalt preheater, in millions of cubic feet per 12-month period, multiplied by 0.6 pound per million cubic feet and divided by 2000 pounds per ton; and

ii. For PM10, the summation of: b. multiplied by 0.055 pound per ton of asphalt and divided by 2000 pounds per ton and, the actual amount of natural gas burned in the asphalt preheater, in millions of cubic feet per 12-month period, multiplied by 7.6 pounds per million cubic feet and divided by 2000 pounds per ton, and the summation of the PM10 emissions from T006 and T007 as calculated by the Tanks 4.09d emissions estimation software.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05)

(2) For SO2 emissions, the permittee shall maintain monthly records of the following information for emissions units P004 & P005, combined, and for PM10 emissions, the permittee shall maintain the following information for emissions units P004, P005, T006 and T007, combined, when burning natural gas in combination with No. 2 fuel oil in the asphalt preheater:

a. The amount of No. 2 fuel oil burned, in gallons;

b. The oxidized asphalt production rate, in tons;

c. The updated, rolling, 12-month summation of the amount of No. 2 fuel oil burned, in gallons;

d. The updated, rolling, 12-month summation of the oxidized asphalt production rate, in tons; and

e. The updated rolling, 12-month summations of the SO2 and PM10 emissions, in tons, from asphalt blowing and natural gas and No. 2 fuel oil combustion in the asphalt preheater:

i. For SO2, the summation of: b. multiplied by 0.86 pound per ton of asphalt and divided by 2000 pounds per ton and, c. multiplied by the actual SO2 emissions as calculated in f)(1), in pounds SO2 per gallon of No. 2 fuel oil, and divided by 2000 pounds per ton, and the actual amount of natural gas burned in the asphalt preheater, in millions of cubic feet per 12-month period, multiplied by 0.6 pound per million cubic feet and divided by 2000 pounds per ton; and

ii. For PM10, the summation of: b. multiplied by 0.055 pound per ton of asphalt and divided by 2000 pounds per ton and, c. multiplied by 0.002 pound per gallon of No. 2 fuel oil, and divided by 2000 pounds per ton, and the actual amount of natural gas burned in the asphalt preheater, in millions of cubic feet per 12-month period, multiplied by 7.6 pounds per million cubic feet and divided by 2000 pounds per ton, and the summation of the PM10 emissions from T006 and T007 as calculated by the Tanks 4.09d emission estimation software.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05)

(3) The permittee shall maintain monthly records indicating the use of ferric chloride, or any other catalyst, in emissions units P004 and P005. If no catalysts are used in P004 and P005, the permittee shall state so in the Monthly Record.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(4) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds SO2/1000 gallons of No. 2 fuel oil). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F) and converted to the units, pounds SO2/1000 gallons of No. 2 fuel oil). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit

below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(7) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. A description of the corrective action;

b. The date corrective action was completed;

c. The date and time the deviation ended;

d. The total period of time (in minutes) during which there was a deviation;

e. The temperature readings immediately after the corrective action was implemented; and

f. The name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted

temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(8) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving each blowing still. 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. The total duration of any visible emission incident; and

c. Any corrective actions taken to eliminate the visible emissions.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(9) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving the asphalt preheater portion of these emissions units. 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. Tthe color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. The total duration of any visible emission incident; and

e. Any corrective actions taken to eliminate the visible emissions.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(10) The permit to install (PTI) application for this/these emissions unit(s), P004 & P005, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio

EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. The exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists"(ACGIH)"Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

   Toxic Contaminant: Hydrogen chloride w/ option* to list all toxics, covered under the worst-case toxic modeled.

   TLV (mg/m3): 2.19 (*for which toxic, if using worst case)

   Maximum Hourly Emission Rate (lbs/hr): 0.97 (*for which toxic, if using worst case)

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.53

   MAGLC (ug/m3): 52.14

The permittee, has demonstrated that emissions of hydrogen chloride, from emissions unit(s) P004 & P005, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing

agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(11) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. Changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. Physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit to install (PTI) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. The Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. A copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. The documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(14) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108369:d)(1)- d)(13). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All exceedances of the rolling, 12-month emissions limitation for SO2;

b. All exceedances of the rolling, 12-month emissions limitations for PM10;

c. All exceedances of the rolling, 12-month asphalt production limitations;

d. All exceedances of the rolling, 12-month No. 2 fuel oil usage limitation;

e. All instances of the use of ferric chloride as a catalyst in emissions units P004 and/or P005. If no catalysts are used in P004 and P005, the permittee shall state so in the Quarterly Report;

f. Any exceedance of the allowable sulfur dioxide emission limitation, in pounds SO2/1000 gallons of No. 2 fuel oil, of actual heat input;

g. Each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

h. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

i. Each incident of deviation described in g or ”h” (above) where a prompt investigation was not conducted;

j. Each incident of deviation described in g or “h” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

k. Each incident of deviation described in g or “h” where proper records were not maintained for the investigation and/or the corrective action(s); and

l. Any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(3) 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 when the thermal oxidizer was being fired with either natural gas or fuel oil; and

b. Any corrective actions taken to 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.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0108369: e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0% opacity unless an opacity limit for the blowing stills when fuel oil is used to fire the afterburner (thermal oxidizer) has been established in accordance with 40 CFR 60.474(g). See 40 CFR Part 60, Subpart UU (40 CFR 60.472(b)(5) and 40 CFR 60.474(g)).

For the asphalt preheater portion of these emissions units, visible PE from the stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

b. Emission Limitations:

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.055 pound per ton of asphalt.

Emissions of volatile organic compounds (VOC) shall not exceed 0.0033 pound per ton of asphalt.

Applicable Compliance Method:

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

The stack testing shall be conducted between 2-3 years after the effective date of the Final Title V Permit to Operate for this facility.

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE/PM10 and VOC in the appropriate units and averaging period;

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PE/PM10, Methods 1-5 of 40 CFR Part 60, Appendix A; and

For VOC, Methods 1-4, and 25 or 25(A) of 40 CFR Part 60, Appendix A.

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

The owner or operator shall determine compliance with the PE standard as referenced in 40 CFR 60.474(c).

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

c. Emission Limitations:

PE/PM10 emissions shall not exceed 7.6 pounds per million cubic feet of natural gas or 2 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.

VOC emissions shall not exceed 5.5 pounds per million cubic feet of natural gas or 0.34 pound per 1000 gallons of No. 2 fuel oil.

NOx emissions shall not exceed 100 pounds per million cubic feet of natural gas or 20 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.

CO emissions shall not exceed 84 pounds per million cubic feet of natural gas or 5 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.

Emissions of nitrogen oxides (NOx) shall not exceed 0.12 pound per ton of asphalt.

Emissions of carbon monoxide (CO) shall not exceed 0.59 pound per ton of asphalt.

Emissions of SO2 shall not exceed 0.86 pound per ton of asphalt.

SO2 emissions shall not exceed 0.6 pound per million cubic feet of natural gas

Applicable Compliance Methods:

Compliance with the emission limitations from the combustion of natural gas in the asphalt preheater shall be demonstrated by the emission factors outlined in AP-42, Fifth Edition, Volume I, Chapter 1.4, Natural Gas Combustion, 7/98.

Compliance with the emission limitations from the combustion of fuel oil in the asphalt preheater shall be demonstrated by the emission factors outlined in AP-42, Fifth Edition, Volume I, Chapter 1.3, Fuel Oil Combustion, 9/98.

Compliance with the 0.12 pound per ton of asphalt of NOx emission limitation, the 0.59 pound per ton of asphalt of CO emissions limitation, and the 0.86 pound per ton of asphalt of SO2 emission limitation shall be demonstrated by the emission factor outlined in "The Magnitude and Source of Air Emissions from Asphalt Blowing Operations", Environmental Progress, Spring 1998, page 55, Table 3.

Pursuant to OAC rule 3745-18-04(F)(4), from natural gas, the sulfur dioxide emission rate shall be considered to be equal to 0.0 pounds of sulfur dioxide per MMBtu.

Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)

d. Emission Limitation:

SO2 emissions shall not exceed 71 pounds per 1000 gallons of No. 2 fuel oil from the asphalt preheater.

Applicable Compliance Method:

Compliance with the emissions limitation from the combustion of fuel oil in the asphalt preheater shall be demonstrated by the method outlined in OAC rule 3745-18-04(F)(2):

$ER = (1 \times 10^6)/H \times D \times S \times 1.974$

Where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the liquid fuel in Btu per gallon;

D = the density of the liquid fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the liquid fuel.

The permittee shall convert the results in pounds of sulfur dioxide per MMBtu to pounds of sulfur dioxide per 1000 gallons of No. 2 fuel oil.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

e. Emission Limitations:

Emissions of sulfur dioxide (SO2) shall not exceed 46.90 TPY from emissions units P004 and P005, combined, based upon a rolling, 12-month summation burning natural gas exclusively in the asphalt preheater.

Emissions of SO2 shall not exceed 49.99 TPY from emissions units P004 and P005, combined, based upon a rolling, 12-month summation when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

Emissions of PM10 shall not exceed 3.98 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas exclusively in the asphalt preheater.

Emissions of PM10 shall not exceed 3.80 tons per year (TPY), based upon a rolling, 12-month summation, from emissions units P004, P005, T006 and T007, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

Applicable Compliance Methods:

Compliance with the rolling, 12-month summations of SO2 and PM10 shall be demonstrated by the recordkeeping requirements in d)(1) and d)(2).

The rolling, 12-month SO2 and PM10 emissions limitations were calculated based on information submitted in PTI Application A0038654, February 2010, for Permit Number P0105996 (superseded with PTI P0108369):

109,000 tons of asphalt/yr x 0.86 lb of SO2/ton of asphalt x 1 Ton/2000 lbs = 46.87 TPY SO2; and

88.48 MMcf of natural gas/yr x 0.6 lb of SO2/MMcf of natural gas x 1 Ton/2000 lbs = 0.03 TPY of SO2.

Total when burning natural gas exclusively: 46.87 TPY + 0.03 TPY = 46.90 TPY SO2.

99,400 tons of asphalt/yr x 0.86 lb of SO2/ton asphalt x 1 Ton/2000 lbs = 42.74 TPY of SO2;

59.75 MMcf of natural gas/yr x 0.6 lb of SO2/MMcf of natural gas x 1 Ton/2000 lbs = 0.02 TPY of SO2; and

203,720 gallons of fuel oil/yr x 142(0.5)lb of SO2/1000 gallons of fuel oil x 1 Ton/2000 lbs = 7.23 TPY of SO2.

Total when burning natural gas in combination with maximum fuel oil: 42.74 TPY + 0.02 TPY + 7.23 TPY = 49.99 TPY SO2

109,000 tons of asphalt/yr x 0.055 lb of PM10/ton of asphalt x 1 Ton/2000 lbs = 3.00 TPY of PM10; and

88.48 MMcf of natural gas/yr x 7.6 lbs of PM10/MMcf of natural gas x 1 Ton/2000 lbs = 0.34 TPY of PM10.

From T006 & T007 Tanks 4.09d calculations: 0.64 TPY of PM10.

Total when burning natural gas exclusively: 3.00 TPY + 0.34 TPY + 0.64 TPY = 3.98 TPY of PM10.

99,400 tons of asphalt/yr x 0.055 lb of PM10/ton of asphalt x 1 Ton/2000 lbs = 2.73 TPY of PM10;

59.75 MMcf of natural gas/yr x 7.6 lbs of PM10/MMcf of gas x 1 Ton/2000 lbs = 0.23 TPY of PM10;

203,720 gallons of fuel oil/yr x 0.002 lb of PM10/gallon of fuel oil x 1 Ton/2000 lbs = 0.20 TPY of PM10; and

From T006 & T007 Tanks 4.09d calculations: 0.64 TPY of PM10.

Total when burning natural gas in combination with maximum fuel oil: 2.73 TPY + 0.23 TPY + 0.20 TPY + 0.64 TPY = 3.80 TPY PM10

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

f. Emission Limitations:

PE/PM10 shall not exceed 3.34 tons per year (TPY) from emissions units P004 and P005, combined, when burning natural gas exclusively in the asphalt preheater.

PE/PM10 shall not exceed 3.16 tons per year (TPY) from emissions units P004 and P005, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

Applicable Compliance Methods:

Compliance with the annual emission limitations shall be demonstrated by the PE/PM10 emissions from P004 and P005, as calculated in the recordkeeping requirements in d)(1) and d)(2).

The annual emission limitations/voluntary restrictions were calculated based on information submitted in PTI Application A0038654, February 2010, for Permit Number P0105996 (superseded with PTI P0108369):

109,000 tons of asphalt/yr x 0.055 lb of PM10/ton of asphalt x 1 Ton/2000 lbs = 3.00 TPY of PM10;and

88.48 MMcf of natural gas/yr x 7.6 lbs PM10/MMcf of natural gas x 1 Ton/2000 lbs = 0.34 TPY of PM10.

Total when burning natural gas exclusively: 3.00 TPY + 0.34 TPY = 3.34 TPY of PM10.

99,400 tons of asphalt/yr x 0.055 lb of PM10/ton of asphalt x 1 Ton/2000 lbs = 2.73 TPY of PM10;

59.75 MMcf of natural gas/yr x 7.6 lbs of PM10/MMcf of natural gas x 1 Ton/2000 lbs = 0.23 TPY of PM10; and

203,720 gallons of fuel oil/yr x 0.002 lb of PM10/gallon of fuel oil x 1 Ton/2000 lbs = 0.20 TPY of PM10.

Total when burning natural gas in combination with maximum fuel oil: 2.73 TPY + 0.23 TPY + 0.20 TPY = 3.16 TPY of PM10.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

g. Emission Limitations:

VOC emissions shall not exceed 0.42 TPY from emissions units P004 and P005, combined, when burning natural gas exclusively in the asphalt preheater.

VOC emissions shall not exceed 0.35 TPY from emissions units P004 and P005, combined, when burning natural gas in combination with the maximum allowable amount of No. 2 fuel oil in the asphalt preheater.

Applicable Compliance Methods:

Compliance with the annual VOC emission limitations shall be demonstrated by the summation of the following calculations:

When consuming natural gas exclusively:

actual natural gas consumption, MMcf/yr x 5.5 lb of VOC/MMcf of natural gas x 1 Ton/2000 lbs = TPY of VOC; and

actual asphalt blowing when consuming natural gas, Tons/yr x 0.0033 lb of VOC/Ton of asphalt x 1 Ton/2000 lbs = TPY of VOC.

When consuming natural gas in combination with fuel oil:

actual natural gas consumption, MMcf/yr x 5.5 lb of VOC/MMcf of natural gas x 1 Ton/2000 lbs = TPY of VOC; and

actual fuel oil consumption, thousands of gal/yr x 0.34 lb of VOC/thousand gallon x 1 Ton/2000 lbs = TPY of VOC; and

actual asphalt blowing when consuming natural gas, Tons/yr x 0.0033 lb of VOC/Ton of asphalt x 1 Ton/2000 lbs = TPY VOC.

Authority for term: (OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0108369: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Asphalt Storage Tanks: T003, T004, T005,

EU ID	Operations, Property and/or Equipment Description
T003	40,000 gallon asphalt storage tank
T004	40,000 gallon asphalt storage tank
T005	40,000 gallon asphalt storage tank

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	Exemption for storing low vapor pressure petroleum liquids. See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the following information for the fixed roof tank:

a. The types of petroleum liquids stored in the tank; and

b. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

Authority for term: (OAC rules 3745-21-09(L)(3) and 3745-77-07(C)(1))

e) Reporting Requirements

(1) If the permittee places, stores, or holds, in the fixed roof tank, any petroleum liquid with a true vapor pressure that is greater than 1.52 pounds per square inch absolute and such tank does not comply with the requirements of paragraph (L)(1) of OAC rule 3745-21-09, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of becoming aware of the occurrence. The date that such petroleum liquid was first stored in the tank, the date removed (if removed), the total gallons throughput of each petroleum liquid exceeding this vapor pressure, and the proposed method of compliance shall be included in the report.

Authority for term: (OAC rules 3745-21-09(L)(4) and and 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid that, as stored, has a true vapor pressure greater than 1.52 pounds per square inch absolute, unless the tank is equipped with an internal floating roof (or equivalent control approved by the Director) in accordance with the requirements of paragraph (L)(1) of OAC rule 3745-21-09 prior to storing a petroleum liquid with a higher vapor pressure.

Applicable Compliance Method:

Compliance with the vapor pressure requirement in b)(2)a. of these terms and conditions shall be demonstrated by the recordkeeping requirement in d)(1) of these terms and conditions.

Authority for term: (OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.