STATEMENT OF BASIS

TITLE V AIR OPERATION PERMIT REVISION
PROPOSED Permit No.: 0310050-017-AV
Revision of Title V Air Operation Permit No.: 0310050-012-AV

APPLICANT

The applicant for this project is Owens Corning Roofing and Asphalt, LLC. The applicant's responsible official and mailing address are: Mr. Chris J. Preslock, Site Leader, Owens Corning Roofing and Asphalt, LLC, Jacksonville Plant, 1035 Talleyrand Avenue, Jacksonville, FL 32206.

FACILITY DESCRIPTION

This facility consists of a manufacturing plant for the production of asphalt and a manufacturing plant for the production of roofing products, including asphalt shingles. The plant processes several types of asphalts with various characteristics such as non-oxidized and oxidized. Regulated emission units include material handling operations, mineral application area (surfacing area), asphalt coater system, asphalt convertors (blowing stills), asphalt and asphalt products storage tanks, and asphalt loading equipment. The facility does not utilize a catalyst in the asphalt blowing process.

PROJECT DESCRIPTION

This permit is for the purpose of revising Title V Air Operation Permit No. 0310050-012-AV by incorporating the terms and conditions of Air Construction Permit No. 0310050-015-AC. Additionally, an emissions unit has been added for one existing emergency stationary compression ignition (CI) reciprocating internal combustion engine (RICE), which is subject to 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, and Subpart A – General Provisions.

PRIMARY REGULATORY REQUIREMENTS

The facility is subject to the provisions of New Source Performance Standards (NSPS), 40 Code of Federal Regulation (CFR) 60, Subpart UU, Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture, 40 CFR 60, Subpart A, General Provisions; 40 CFR 63, Subpart AAAAAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing, 40 CFR 63, Subpart A, General Provisions; and Particulate Matter (PM) Reasonably Available Control Technology (RACT) requirements. The facility has a facility-wide emission limit for hazardous air pollutants (HAP) of less than 10 tons per year for any single HAP and less than 25 tons per year for total HAPs classifying it as a Synthetic Minor Source of HAPs.

Compliance Assurance Monitoring (CAM) applies to Emissions Unit Nos. 028 and 029. Emission Unit No. 012 is no longer subject to CAM requirements. It is exempt since it is subject to a NESHAP that was promulgated after 11/15/1990. The NESHAP has CAM equivalent monitoring requirements included as part of the standard.

The control technology description and monitoring approach for each emissions unit subject to CAM is the same and summarized as follows:

The effectiveness of the baghouses is evaluated with annual opacity measurements from the baghouse stack. The pressure differential in inches of water will be monitored continuously and recorded daily. Visible emissions from the dust collector's exhaust will be monitored weekly using EPA RM 22 or similar observations.

PROJECT REVIEW

This permit is for the purpose of revising Title V Air Operation Permit No. 0310050-012-AV by incorporating the terms and conditions of Air Construction Permit No. 0310050-015-AC. Additionally, an emissions unit has been added for one existing emergency stationary compression ignition (CI) reciprocating internal combustion engine (RICE), which is subject to 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, and Subpart A – General Provisions.

CONCLUSION

This project revises Title V Air Operation Permit No. 0310050-012-AV, which was issued on March 19, 2009. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213 and 214. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawing(s), plans, and other documents on file with the Permitting Authority.

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