

COMMISSION

Victor D. Crist Lesley "Les" Miller, Jr.
Ken Hagan Sandra L. Murman
Al Higginbotham Stacy White
Pat Kemp



EXECUTIVE DIRECTOR
Janet L. Dougherty

DIVISION DIRECTORS

Legal & Admin.	Richard Tschantz, Esq.
Air Management	Jerry Campbell, P.E.
Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Kelly Bishop, P.G.

Alex Lim
Plant Manager
Building Materials Manufacturing Corp.
5138 Madison Ave.
Tampa, FL 33619

RE: Project No. 0570056-040-AC
 Building Materials Manufacturing Corp.
 Asphalt Mat Coater Control Device

Dear Mr. Lim:

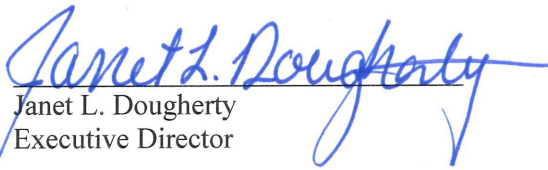
On January 30, 2017, Building Materials Manufacturing Corp., submitted an application to authorize the after-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System to control emissions from the Asphalt Mat Coater. The existing facility is located in Hillsborough County at 5138 Madison Ave., Tampa, Florida 33619.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Revised Technical Evaluation and Preliminary Determination; and the Revised Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact Diana M. Lee, P.E., Chief, Air Permitting, at (813) 627-2600 ext. 1276 or by email at lee@epchc.org.

Executed in Tampa, Florida.

Sincerely,


Janet L. Dougherty
Executive Director

Enclosures

JLD/LAW/law

Environmental Excellence in a Changing World

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

An Affirmative Action / Equal Opportunity Employer

1. PERMITTEE

Building Materials Manufacturing Corp.
5138 Madison Ave.
Tampa, FL 33619

2. PERMITTING AUTHORITY

Environmental Protection Commission of Hillsborough County (EPCHC)
3629 Queen Palm Dr.
Tampa, FL 33619

3. PROJECT

Air Permit No. 0570056-040-AC
Minor Air Construction Permit
Building Materials Manufacturing Corp.

This permit authorizes the after-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System. This system controls fumes and particulate matter emissions from the Asphalt Mat Coater (EU No. 001).

4. NOTICE AND PUBLICATION

The EPCHC distributed a draft minor air construction permit package on March 3, 2017.

COMMENTS

Applicant

On March 10, 2017, Cory Houchin of Environmental Sciences Group, Inc. submitted comments on the Draft Permit via email, on behalf of Building Materials Manufacturing Corp. The following summarizes the comments and the EPCHC's response.

Comment Nos. 1 and 2: The federal PM limit is based on tons of shingles produced. However, Spec. Cond. A.2.B) limits total shingles. Can we change that language to "tons shingles"?

In addition, as discussed via email in March 2016, all of the back surfacing emissions are now being collected by EU 002. EU No. 003 was removed from the facility. With the removal of EU 003, 3.4 ton PM/year are available to add to the Mat Coater (EU 001), bringing the total PM emissions for that source to 12.7 ton/year without changing the facility-wide total PM emissions of 93.9 tons/yr. This will increase the allowable tons of shingles produced per year.

Response: In accordance with 40 CFR 60 Subpart UU, particulate matter emissions from the asphalt mat coater are limited to 0.08 lb/ton of asphalt shingles produced. Based on the permit application, the facility requested a more restrictive PM emissions limit of 0.06 lb/ton of asphalt shingles produced, which is consistent with the Area Source NESHAP, 40 CFR 63, Subpart AAAAAAA. This NESHAP has not been adopted by the State of Florida. Since the PM emissions standard is based on the tons of shingles produced, the condition is changed as requested, to limit the tons of shingles produced.

In regards to the facility-wide total PM emissions, since the emissions from the West Back Surfacing System (EU 003) are vented to and are accounted under EU-002-East Back Surfacing System, the facility-wide PM potential to emit is reduced by 3.4 tons/year to 90.5 tons/year. So, as requested, the annual limit on the tons of shingles

REVISED DRAFT DETERMINATION

produced has been increased to 424,000 tons, which equates to their previously facility-wide PTE of 93.9 tons/year. Therefore, as requested, Specific Condition Nos. A.2. A.6., and A.7., are changed as follows;

From:

A.2. Permitted Capacity: As requested by the permittee, the following limitations shall apply: [Rules 62-210.200(PTE) and 62-4.070(3), F.A.C., and Air Construction Permit Application Received January 30, 2017]

- B) The maximum amount of asphalt shingles produced shall not exceed *195,000,000 shingles* per twelve consecutive month period.

A.6. As requested by the permittee, the particulate matter emissions shall not exceed the following. [Rule 62-296.700, F.A.C.; 40 CFR 60.472; Chapter 1-3.52 Rules of the EPC; and Air Construction Permit Application Received January 30, 2017]

<u>gr/dscf</u>	<u>lb/ton of asphalt shingles produced</u>	<u>ton/yr</u>	<u>Opacity</u>
0.03	0.06	9.3	5%

{Permitting note: By meeting the PM standard of 0.06 lb/ton, the Asphalt Mat Coater will meet the PM standard of 0.08 lb/ton of NSPS Subpart UU}

A.7. The permittee shall maintain records in order to ensure compliance with Specific Condition Nos. A.2. and A.3. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least three years. The records shall include, as a minimum: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- H) Monthly *number of asphalt shingles* produced

To:

A.2. Permitted Capacity: As requested by the permittee, the following limitations shall apply: [Rules 62-210.200(PTE) and 62-4.070(3), F.A.C., and Air Construction Permit Application Received January 30, 2017]

- B) The maximum amount of asphalt shingles produced shall not exceed *424,000 tons* of asphalt shingles per twelve consecutive month period.

A.6. As requested by the permittee, the particulate matter emissions shall not exceed the following. [Rule 62-296.700, F.A.C.; 40 CFR 60.472; Chapter 1-3.52 Rules of the EPC; and Air Construction Permit Application Received January 30, 2017]

<u>lb/ton of asphalt shingles produced</u>	<u>ton/yr</u>	<u>Opacity</u>
0.06	12.7	5%

{Permitting note: By meeting the PM standard of 0.06 lb/ton, the Asphalt Mat Coater will meet the PM standard of 0.08 lb/ton of NSPS Subpart UU}

A.7. The permittee shall maintain records in order to ensure compliance with Specific Condition Nos. A.2. and A.3. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least three years. The

REVISED DRAFT DETERMINATION

records shall include, as a minimum: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

H) Monthly *tons* of asphalt shingles produced

5. CONCLUSION

The action of the EPCHC is to issue the Revised Draft Permit with the changes described above.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Building Materials Manufacturing Corp.
5138 Madison Ave.
Tampa, FL 33619

Project No. 0570056-040-AC
Minor Air Construction Permit

Authorized Representative:
Alex Lim, Plant Manager

After-the-Fact Construction for the Asphalt Mat
Coater Control Device
Hillsborough County, Florida

Facility Location: Building Materials Manufacturing Corp. operates the existing facility, which is located in Hillsborough County at 5138 Madison Ave. in Tampa, Florida.

Project: This project authorizes the after-the-fact construction of an Airclear Fiberbed Coalescing System to control emissions from the Asphalt Mat Coater. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical/mailling address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813-627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the draft permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Comments: The Permitting Authority will accept written comments concerning the draft permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the draft permit, the Permitting Authority shall revise the draft permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-260 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

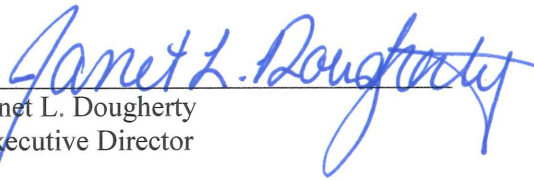
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY



Janet L. Dougherty
Executive Director

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

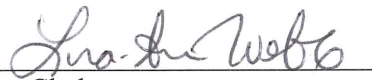
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written notice of Intent to Issue Air Permit package (including the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the draft permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested, or was sent via mail, before the close of business on the date indicated below to the following persons.

Alex Lim – Building Materials Manufacturing Corp. alim@gaf.com

Cory A. Houchin, P.E. – Environmental Sciences Group, Inc. HouchinC@environmentalsciencesgroup.com

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

 3/23/2017
Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Draft Minor Air Construction Permit
Draft Air Permit No. 0570056-040-AC
Building Materials Manufacturing Corp.
Hillsborough County, FL

Applicant: The applicant for this project is Building Materials Manufacturing Corp. The applicant's authorized representative and mailing address is: Alex Lim, Plant Manager, 5138 Madison Ave., Tampa, FL 33619.

Facility Location: Building Materials Manufacturing Corp. operates the existing facility, which is located in Hillsborough County at 5138 Madison Ave., Tampa, FL 33619.

Project: After-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System to control emissions from the Asphalt Mat Coater. This facility will remain a synthetic minor source of emissions.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical/mailling address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's phone number is 813-627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <https://fldep.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the

petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-260 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.



TECHNICAL EVALUATION

&

PRELIMINARY DETERMINATION

APPLICANT

Building Materials Manufacturing Corp.
5138 Madison Ave.
Tampa, FL 33612
Facility ID No. 0570056

PROJECT

Project No. 0570056-040-AC
Application for Minor Source Air Construction Permit
After-the-Fact Construction for the Asphalt Mat Coater Control Device

COUNTY

Hillsborough County, Florida

PERMITTING AUTHORITY

Environmental Protection Commission of Hillsborough County
3629 Queen Palm Dr.
Tampa, FL 33619

March 23, 2017

1. GENERAL PROJECT INFORMATION

• Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Building Materials Manufacturing Corp. is an asphalt roofing shingles manufacturing operation and is categorized under Standard Industrial Classification Code No. 2952 – Asphalt Felts and Coating. The existing facility is located in Hillsborough County at 5138 Madison Ave., Tampa, FL 33619. The UTM coordinates of the facility are Zone 17, 362.5 km East, and 3087.1 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS), except for ozone. Hillsborough County is designated as an air quality maintenance area for ozone.

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This permit authorizes the after-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System. This system controls fumes and particulate matter emissions from the Asphalt Mat Coater (EU No. 001).

Processing Schedule

January 30, 2017 - Received the application for a minor source air pollution construction permit.

Not Applicable - Requested additional information.

January 30, 2017 - Application Complete.

2. DEPARTMENT REVIEW

This permit authorizes the after-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System. This system controls fumes and particulate matter emissions from the Asphalt Mat Coater (EU No. 001).

Building Materials Manufacturing Corp. manufactures asphalt roofing shingles by applying an asphalt coating mixture to a fiberglass mat in the Asphalt Mat Coater (EU No. 001). The process begins by pumping asphalt coating from storage tanks into the manufacturing building. The coating is then mixed with limestone, using agitator blades, in a closed, horizontal mix tank that is 30" in diameter and 7 feet in length and heated by a hot oil system. In addition, a circulating asphalt heater (coating loop heater) re-circulates the asphalt coating mixture to ensure that the mixture has the required viscosity. Emissions from the asphalt mat coater are controlled by the 24,000 ACFM Airclear, Model No. 38208J2, Fiberbed Coalescing System.

A fiberglass mat is fed to the Asphalt Mat Coater, where it is coated with the asphalt coating mixture by spreading the mixture evenly across the mat with two knives. Colored granules are applied to the face of the mat and sand is applied to the back. The granulated mat is then cooled by moving it over rollers and is directed to either a shingle cutter or a pattern cutter. Two layers of mat are joined by a laminating resin in the pattern cutting section. The shingles are then wrapped and palletized for shipment.

In addition, this permit does not include any testing requirements for the new control device since the facility performed VE and PM testing on the Airclear Fiberbed Coalescing System on November 30 and December 1, 2016, respectively. This testing was determined to be in compliance with the emission standards specified in Permit No. 0570056-038-AC. Annual testing requirements will be included in Permit No. 0570056-041-AF.

Also, this permit re-evaluated the potential PM emissions from the Asphalt Mat Coater based on the tons of shingles produced in order to maintain consistency with the federal regulations. Based on the information provided by Building Materials Manufacturing Corp., the facility produces 1,188.71 shingles per ton of asphalt coating or 367,582,416 shingles per twelve month period.

According to the permittee, each shingle weighs approximately 3.17 pounds, which equates to 582,618.1 tons of shingles per twelve month period. Using the emissions factor of 0.06 lb PM/ton of shingles produced and the maximum number of shingles produced in a year, the potential PM emissions from the asphalt mat coater are calculated to be 17.5 tons/year. In order to limit the potential PM emissions from the asphalt mat coater to 12.7 tons/year and keep the facility below TV limits, as requested by the permittee, this permit includes a condition limiting the amount of shingles produced to 424,000 tons per twelve month period. This permit also includes a condition to maintain records on the amount of shingles produced on a monthly and yearly basis.

Building Materials Manufacturing Corp. is a synthetic minor source of VOC and PM emissions. The facility-wide PTE for VOC and PM remains limited to 92.3 TPY and 93.9 TPY, respectively. The facility is subject to 40 CFR 60, Subpart UU (Asphalt Processing and Asphalt Roofing Manufacture), and PM-RACT, Rules 62-296.711, F.A.C. (Materials Handling, Sizing, Screening, Crushing and Grinding Operations) and 62-296.712, F.A.C. (Miscellaneous Manufacturing Process Operations).

In addition, the facility is subject to 40 CFR 63, Subpart AAAAAAA (National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing). However, this NESHAP has not been adopted by the State of Florida and therefore, it is not referenced in this permit.

Summary of Emissions

EU No. 001 -

Pollutant	Potential Emissions (TPY)	Actual Emissions (TPY)	Increase in Emissions (TPY)	Allowable Emissions
PM	12.7	1.8	10.9	0.06 lb PM per Ton of Asphalt Shingle Produced 5% opacity
VOC	25.2	4.8	20.4	NA

- The actual emissions are based on the average of 2014 and 2015 AOR data.
- The Potential PM emissions are based on a PM emissions limit of 0.06 lb PM per ton of asphalt shingles produced and 424,000 tons of shingles produced per twelve month period.
- The potential VOC emissions are based on an emission factor of 0.163 lbs VOC/ton of asphalt/limestone mixture from a 2008 stack test at the facility, a throughput of 35.3 tons of asphalt/limestone mixture per hour, and 8,760 hours of operation.
- The facility wide PM PTE is 93.9 tons/year.

Local Requirements

Rules of the EPCHC, Chapter 1-3 - Stationary Air Pollution and Ambient Air Quality Standards

State Requirements

Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards

Rule 62-296.700, F.A.C. – Reasonably Available Control Technology (RACT) Particulate Matter

Rule 62-296.712, F.A.C. - Miscellaneous Manufacturing Process Operations

Federal NSPS Provisions

40 CFR 60 Subpart A – General Provisions

40 CFR 60 Subpart UU - Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Federal NESHAP Provisions

40 CFR 63 Subpart AAAAAAA—National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing. This NESHAP has not been adopted by the State of Florida.

Other Draft Permit Requirements

NA

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Lora Webb is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting Lora Webb or Diana M. Lee, P.E. Chief, Air Permitting, at (813) 627-2600 or by email at webbl@epchc.org or lee@epchc.org.



COMMISSION

Victor D. Crist Lesley "Les" Miller, Jr.
Ken Hagan Sandra L. Murman
Al Higginbotham Stacy White
Pat Kemp

DIVISION DIRECTORS

Legal & Admin.	Richard Tschantz, Esq.
Air Management	Jerry Campbell, P.E.
Waste Management	Hooshang Boostani, P.E.
Water Management	Sam Elrabi, P.E.
Wetlands Management	Kelly Bishop, P.G.

EXECUTIVE DIRECTOR

Janet L. Dougherty

PERMITTEE

Building Materials Manufacturing Corp.
5138 Madison Ave.
Tampa, FL 33619

Air Permit No.0570056-040-AC
Permit Expires: September 3, 2017

Authorized Representative:
Craig Best, Plant Manager

Minor Air Construction Permit
After-the-Fact Construction for the Asphalt Mat
Coater Control Device

PROJECT

This is the final air construction permit, which authorizes the after-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System to control fumes and particulate matter emissions from the Asphalt Mat Coater. The proposed work will be conducted at the existing facility, which is an asphalt roofing shingle manufacturing operation and is categorized under Standard Industrial Classification Code No. 2952 – Asphalt Felts and Coating. The existing facility is located in Hillsborough County at 5138 Madison Ave., Tampa, FL 33619. The UTM coordinates of the facility are 17, 362.5 km East, and 3087.1 km North.

This permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

Janet L. Dougherty
Executive Director

Environmental Excellence in a Changing World

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

An Affirmative Action / Equal Opportunity Employer

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written notice of Intent to Issue Air Permit package (including the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the draft permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested, or was sent via mail, before the close of business on the date indicated below to the following persons.

Alex Lim – Building Materials Manufacturing Corp. alim@gaf.com

Cory A. Houchin, P.E. – Environmental Sciences Group, Inc. HouchinC@environmentalsciencesgroup.com

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Clerk

Date

SECTION 1. GENERAL INFORMATION (REVISED DRAFT)

FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 0570056	
ID No.	Emission Unit Description
001	Asphalt Mat Coater

Building Materials Manufacturing Corp. manufactures asphalt roofing shingles. This permit authorizes the after-the-fact construction of a 24,000 ACFM Airclear, Model No. 38208J2, Fiberbed Coalescing System. This system controls fumes and particulate matter emissions from the Asphalt Mat Coater (EU No. 001).

The asphalt roofing shingles are manufactured by applying an asphalt coating mixture to a fiberglass mat in the Asphalt Mat Coater (EU No. 001). The process begins by pumping asphalt coating from storage tanks into the manufacturing building. The coating is then mixed with limestone, using agitator blades, in a closed, horizontal mix tank that is 30" in diameter and 7 feet in length and heated by a hot oil system. In addition, a circulating asphalt heater (coating loop heater) re-circulates the asphalt coating mixture to ensure that the mixture has the required viscosity.

A fiberglass mat is fed to the Asphalt Mat Coater, where it is coated with the asphalt coating mixture by spreading the mixture evenly across the mat with two knives. Colored granules are applied to the face of the mat and sand is applied to the back. The granulated mat is then cooled by moving it over rollers and is directed to either a shingle cutter or a pattern cutter. Two layers of mat are joined by a laminating resin in the pattern cutting section. The shingles are then wrapped and palletized for shipment.

PROPOSED PROJECT

This permit authorizes the after-the-fact construction of a 24,000 ACFM Airclear Fiberbed Coalescing System, to control fumes and particulate matter emissions from the Asphalt Mat Coater (EU No. 001).

This project will modify the following emission units:

EU No.	Description
001	Asphalt Mat Coater

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (REVISED DRAFT)

- FW1.** Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the Environmental Protection Commission of Hillsborough County.
- FW2.** Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.
- FW3.** Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); Appendix 40 CFR 60 Subpart A; Appendix 40 CFR 60 Subpart UU.
- FW4.** Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
- FW5.** New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C.]
- FW6.** Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rule 62-210.300(1), F.A.C.]
- FW7.** The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1), F.A.C.]
- A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
 - B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
 - C) Immediately attend to all spills/waste as appropriate
- FW8.** The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.
- FW9.** All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading,

SECTION 2. ADMINISTRATIVE REQUIREMENTS (REVISED DRAFT)

unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following: [Rule 62-296.320(4)(c), F.A.C.]

- A) Paving or maintenance of roads, parking areas, and yards.
- B) Application of water when necessary to control emissions.
- C) Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent re-entrainment, and from buildings or work areas to prevent particulates from becoming airborne.
- D) Proper operation and maintenance of the material transport and storage system.
- E) Use of coverings or enclosures, as necessary.
- F) Curtailing of operation if winds are entraining unconfined particulate matter.
- G) Posting of vehicle (or truck) speed limits, if necessary.

FW10. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(8)(c), F.A.C.]

FW11. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

FW12. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

FW13. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided (1) best practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the EPCHC for longer duration. Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(1), F.A.C.]

FW14. In order to establish the facility as a synthetic minor source for Hazardous Air Pollutants (HAPs), the HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs. [Rule 62-210.200, F.A.C.]

FW15. The facility wide maximum natural gas fuel usage shall not exceed 127 million cubic feet per twelve consecutive month period. [Rule 62-4.070(3), F.A.C. and Permit No. 0570056-006-AC]

FW16. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (REVISED DRAFT)

FW17. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

DRAFT

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (REVISED DRAFT)

A. EU No. 001 – Asphalt Mat Coater

This section of the permit addresses the following emissions units.

EU No.	Description
001	Asphalt Mat Coater

EQUIPMENT

A.1. Equipment Name: The permittee is authorized to install a 24,000 ACFM Airclear, Model No. 38208J2, Fiberbed Coalescing System. [Rule 62-4.070(3), F.A.C.; and Permit Application Received January 30, 2017]

PERFORMANCE RESTRICTIONS

A.2. Permitted Capacity: As requested by the permittee, the following limitations shall apply: [Rules 62-210.200(PTE) and 62-4.070(3), F.A.C., and Air Construction Permit Application Received January 30, 2017]

- A) The maximum asphalt mat coating processing rate shall not exceed 35.3 tons per hour of asphalt/limestone mixture.
- B) The maximum amount of asphalt shingles produced shall not exceed 424,000 tons of asphalt shingles per twelve consecutive month period.
- C) The maximum temperature of the asphalt mixture shall not exceed 480° F, respectively, averaged daily.
- D) The particulates from the asphalt coating process shall be vented to the fiberbed coalescing system specified in Specific Condition No. A.1.

A.3. In order to ensure compliance with Specific Condition Nos. A.2. and A.7., the following limitations shall apply: [Rule 62-4.070(3), F.A.C. and Air Construction Permit Application Received January 30, 2017]

- A) The permittee shall calibrate and maintain a magnehelic gauge to measure the static pressure inside the inlet of the evacuation hood over the coating process.
- B) The evacuation hood over the coating process shall be kept at a minimum static pressure of 0.1 inch of water at all times.
- C) The hot asphalt delivery and return troughs shall be kept closed at all times, with the exception of open inspection ports located under the mat coater exhaust hood, and vapors from the mix shall not be allowed to escape into the building.
- D) The permittee shall continuously monitor and record the temperature of the gas at the inlet of the control device and ensure that temperature monitoring instrument shall have an accuracy of $\pm 15^{\circ}\text{C}$ ($\pm 25^{\circ}\text{F}$) over its range, as specified by 40 CFR Subpart UU.
- E) The permittee shall operate and maintain the measuring devices used for determining the air pressure differential (Delta P) across the fiberbed coalescing system, according to the manufacturers' manual. The pressure differential shall be recorded on a daily basis.

A.4. Hours of Operation: The hours of operation are not restricted. [Rule 62-4.070(3), F.A.C.]

EMISSIONS STANDARDS

A.5. The facility is subject to 40 CFR 60 – Subpart UU: Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture. The permittee shall comply with the following requirements: [Rule 62-204.800, F.A.C.; 40 CFR 60.7, 60.11, and 60.12; and 40 CFR 60.470]

- A) The permittee shall furnish the EPC written notification as follows: [40 CFR 60.7(a)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (REVISED DRAFT)

A. EU No. 001 – Asphalt Mat Coater

- 1) A notification of any physical or operational change to an existing facility which may increase the emissions rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an application subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emissions control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The epc may request additional relevant information subsequent to this notice. [40 CFR 60.7 (a)(4)]
- B) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR 60.7(b)]
- C) The permittee shall maintain a file of all measurements, including performance testing measurements and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records. Visible emissions test results are required to be maintained on-site for five years. [40 CFR 60.7(f)]
- D) Compliance with opacity standards shall be determined by conducting observations in accordance with Reference Method 9 in Appendix A (40 CFR 60). [40 CFR 60.11(b)]
- E) The opacity standards set forth in this permit shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 60.11(c)]
- F) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPC which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]
- G) No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

A.6. As requested by the permittee, the particulate matter emissions shall not exceed the following. [Rule 62-296.700, F.A.C.; 40 CFR 60.472; Chapter 1-3.52 Rules of the EPC; and Air Construction Permit Application Received January 30, 2017]

<u>lb/ton of asphalt shingles produced</u>	<u>ton/yr</u>	<u>Opacity</u>
0.06	12.7	5%

{Permitting note: By meeting the PM standard of 0.06 lb/ton, the Asphalt Mat Coater will meet the PM standard of 0.08 lb/ton of NSPS Subpart UU}

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (REVISED DRAFT)

A. EU No. 001 – Asphalt Mat Coater

RECORDS AND REPORTS

A.7. The permittee shall maintain records in order to ensure compliance with Specific Condition Nos. A.2. and A.3. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least three years. The records shall include, as a minimum: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Date
- B) Asphalt Mat Coater Processing Rate (in ton/hr.)
- C) Number of asphalt shingles produced
- D) The temperature of the gas at the inlet of the control device (in °F)
- E) The air pressure differential (Delta P) across the fiberbed coalescing system
- G) Monthly tons of asphalt/limestone mixture coated used
- H) Monthly tons of asphalt shingles produced
- I) 12 month rolling total of Item G) and H) above

